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ABSTRACT

This handbook is intended to be a resource for graduate and professional schools in their efforts to increase minority student representation in their programs. The information is based on analysis of published materials; consultation with knowledgeable individuals, schools, educational organizations, and professional groups concerned with minority enrollment; and outcomes of nine regional workshops which examined issues of recruitment, admissions, financial assistance, and retention in minority enrollment. Of these issues, admissions procedures seemed to have been given the most attention by institutions, especially in regards to use of standardized test scores. The importance of providing supportive services for retention of minority students is stressed. Difficulties and different approaches in the areas of recruitment and financial assistance are addressed. After an introductory chapter, Chapter 2 describes the legal basis for the Office for Civil Rights' attention to minority enrollment in graduate and professional schools; the current status of minority group enrollment; and the major issues. Chapters 3, 4, and 5 are specific treatments of recruitment, admissions, and financial assistance, respectively. Strategies in these areas for enhancing minority enrollment are discussed and assessed. Chapter 6 presents suggested recommendations. Appended are listings of organizations and institutional representatives consulted during this project. (Contains 48 references.) (DB)

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Minority Enrollment in Graduate and Professional Schools

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A Technical Assistance Handbook

Minority Enrollment in Graduate and Professional Schools

- ☐ Recruitment
- ☐ Admissions
- ☐ Financial Assistance

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Prepared for:
Office for Civil Rights
U.S. Department of Education

Prepared by:
Boone, Young & Associates, Inc.
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We are also grateful for the guidance provided by the two Department of Education/Office for Civil Rights Project Officers who oversaw this contract: Frances Lowder and Sharon Solomon. The support they provided in this undertaking was invaluable.

Several staff members of Boone, Young & Associates and Educational Testing Service made significant contributions to this effort. Jesse McCorry, Associate Project Director from BYA, and Clyde Aveilhe, Project Manager for the Subcontractor (ETS), are largely responsible for any success this project achieved. Not only did they work tirelessly on the workshops; they also developed substantial portions of this Handbook.

The Handbook benefited significantly from the work of Richard Thornell of BYA (legal analysis); and Herbert Flamer (financial assistance), William Parker (recruitment), and Carole Slaughter (admissions), all of ETS, who developed the modules in these areas presented in the workshops. BYA staff members Elizabeth Vernon and Robert Major undertook re-drafts of some chapters in the early stages; Harriet Lewis typed all drafts; Arlene Rieber edited and produced the final Handbook; and Monetta K. Anderson and Daryl E. Trawick, then Howard University law students, were project research assistants.

Finally, we acknowledge the assistance of David Johnson of BYA, who was facilitator in many of the workshops; and William James, Marlene Goodison, Dwight Horch, and Valentina Flores, all of ETS, who made presentations.

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Carolyn Atkinson Thornell
Project Director
Boone, Young & Associates, Inc.

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Preface

This Handbook is intended to be a resource for graduate and professional schools in augmenting their efforts to increase minority student representation in their programs. It was produced by Boone, Young & Associates, Inc. (BYA) and Educational Testing Service (ETS) for the Office for Civil Rights (OCR) in the U.S. Department of Education (ED), and is based on research undertaken by BYA and ETS which sought to determine and describe policies and practices being used by graduate and professional schools to increase their minority student enrollments. In addition, some of the material derives from a series of nine regional workshops conducted by BYA and ETS in which technical assistance on this issue was extended to representatives of graduate and professional schools.

This document is a distillation of the experiences of a number of institutions, educational organizations, and professional groups that have grappled with the challenges of increasing minority student enrollment, and it points to successful strategies in these efforts. Institutions are cautioned, however, that the Handbook should not be regarded as a "cookbook," but rather as a source of suggestions and information which may need to be modified to suit the individual circumstances of particular institutions.

We hope that this Handbook will, indeed, achieve its goal of presenting useful, practical information which will ultimately result in increased minority enrollment in graduate and professional schools.

Chapter One

Introduction

Minority enrollment in graduate and professional schools reached a peak in the latter part of the seventies. Since that time there has been a steady erosion of the gains made during the previous decade. Attempts to explain the decline have been the source of much debate among educational policy-makers at all levels of government and in the higher education community. For example, some observers have argued that legal challenges to affirmative action enrollment practices, which are discussed later, have affected both minority groups, by depressing their interest in pursuing graduate or professional degrees, and educational institutions, by diminishing their efforts to implement special programs to enroll minority students. Others have suggested that, especially in professional fields such as business, graduate study lost out to the attractiveness and availability of rather well-paying jobs. Still others have noted the steep rise in the costs of graduate and professional education in attempting to explain changes in minority enrollment in graduate and professional schools.

Nevertheless, it is also the case that a number of institutions and organizations have been trying to reverse this downward trend in minority enrollment. Strengthened minority recruitment programs coupled with supportive services are being used by a range of colleges and universities. Some of

these institutions also have creatively used a variety of funding sources to generate attractive financial aid packages which assist in retaining minority group students once they have been recruited and admitted. Professional schools appear to have the most highly structured programs for increasing minority enrollment. This is not meant to deprecate comparable efforts among some of the graduate schools. But it does seem clear that the professional schools' unitary organizational structure and small size give them an advantage in decision-making efficiency over the graduate schools. The professional schools' minority student-oriented activities also benefit from their ongoing relationships with professional associations and organizations. These groups provide financial resources and recruitment assistance, and can potentially use their accreditation powers as an incentive to secure a school's adoption of policies and practices that are beneficial to minorities.

Highlights of Field Research and Workshops

The Office for Civil Rights held the view that minority recruitment, admissions and financial assistance were the three pivotal factors which influence minority enrollment in professional and graduate schools. These views were confirmed by the field research and technical assistance workshops conducted by Boone, Young & Associates and Educational Testing Service. Field research was performed through obtaining extensive information from published materials,* knowledgeable individuals, schools, educational organizations, and professional groups concerned with minority enrollment;** and nine regional workshops*** which were held with representatives of

* See Appendix A, Bibliography
** See Appendix B, Individuals and Organizations Consulted
*** See Appendix C, Listing of Regional Workshops

professional and graduate schools, attended by admissions officers, recruiters, financial aid officers, and other administrative staff with particular concern for minority enrollment.

Our research disclosed that of the three factors--recruitment, admissions, and financial aid--admissions procedures seemed to have been given the most attention by institutions, especially as they related to the key issue of the proper use of standardized test scores, reflecting the fact that many schools show flexibility in the use of these data in making admission decisions. Nonetheless, we did note that there were institutions which relied heavily on test scores, and some which used the scores as a "cutoff" mechanism. Test-makers admonish against this practice of placing undue emphasis on test scores, a practice which is controversial within and among institutions.

Closely related to admissions is minority student retention. This issue was the subject of much discussion in the workshops and it became apparent that while some schools systematically implement retention programs, a large number of institutions fail to consider the need for some degree of supportive services among minority students as a concomitant of their academic pursuits. Supportive services in this context do not necessarily mean academic remediation. Rather, after discussions with minority graduate and professional students, we concluded that, in a large number of cases, students did not continue in their programs because there were few systematic efforts to assist them in acclimating themselves to a new and somewhat "hostile environment." This lack of support appeared to be most deeply felt on campuses and in programs where a typically small number of minority students found themselves isolated from their minority community. In addition, the students noted that the continuation of active racial hostility on campus reinforced their feelings of isolation.

Obviously, this perception could be expected to have troublesome implications for any student's academic performance. Carefully designed support services have helped a number of colleges and universities to reduce the scope of this problem.

Recruitment continues to be a problem area of significant import to the graduate schools. The problem is not solely a consequence of the graduate disciplines' reluctance to vigorously press this activity. Recruitment is affected by other factors which too often are not given sufficient attention. For example, a recruiting institution's location, size, minority student population, minority faculty complement, financial assistance packages, and student research opportunities all play a role in a student's application decision and, of course, in his or her decision to accept an offer of admission. Effective recruitment of minority students requires a defined program, resources, and commitment if there is to be any reasonable prospect for success.

In the area of financial assistance we noted some divergent views among participants regarding the amount of explanatory weight to be assigned to the availability of funds in a student's decision to enter a graduate or professional program. Indeed, while financial aid was identified by the Office for Civil Rights as an important area to be addressed by this project, some of the information collected by Boone, Young & Associates and Educational Testing Service suggested that it was not so crucial to the students' decisions as had been assumed.

The impact of financing (relative to other factors) on minority student enrollment is difficult to assess because of the lack of coordination between campus-based financial aid policies and practices, and recruitment and admissions procedures for minority students. For example, few of the workshop participants who were responsible for recruitment or admis-

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sions were knowledgeable about the types of financial aid packages their institutions could make available should an applicant be accepted. The workshop discussions provided participants with several examples of how this type of articulation might be brought about so as to enhance the effectiveness of efforts to recruit and enroll minorities. In addition, these discussions provided a number of examples (which are presented later) of current financial award practices at the graduate and professional school level that seemed likely to be of value to the participants, at least to the extent of suggesting possibilities that they might wish to consider at their own institutions.

Contents of Handbook

What follows in the succeeding chapters is a focused discussion of each of the substantive issues addressed in this project. Chapter Two describes, in overview fashion, the legal basis for the Office for Civil Right's attention to minority enrollment in graduate and professional schools; the current status of minority group enrollments in graduate and professional schools; the major issues and concerns raised by graduate and professional school representatives with respect to recruitment, admissions, and financial assistance; and approaches to the problem. In addition, we attempt to give readers a sense of the types of issues and themes that emerged in the various workshop discussions. This chapter also examines the implications of legal issues for affirmative efforts to increase the representation of minority students in graduate and professional schools.

Chapters Three, Four and Five are specific treatments of Recruitment, Admissions, and Financial Assistance, respectively, in which strategies in these areas for enhancing minority enrollment are discussed and assessed.

Finally, in Chapter Six, there is a review, based on the content of each chapter, of suggested recommendations with respect to recruitment, admissions, and financial assistance for improving minority enrollment in graduate and professional schools. In an effort to make this volume more useful, we have included, as appendices, listings of the organizations and institutional representatives with whom we spoke in completing this project and of selected publications on the subjects discussed here.

Chapter Two

Overview

This Office for Civil Rights/U.S. Department of Education (OCR/ED) project of technical assistance was designed to assist graduate and professional schools in their efforts to increase minority enrollments which have been declining in recent years. No one can doubt that a number of factors affect such efforts. Socio-economic and political changes since the late 1960s have created an environment which, while not actively hostile to such affirmative steps, is no longer as warmly supportive. We note, for example, that many graduate and professional schools find themselves with lower revenues and diminishing enrollment overall, and that these factors affect many institutions' ability to expand or initiate actions to increase minority student enrollment. In addition, the downward trend of the economy in the late 1970s and early 1980s is such that some number of potential minority group applicants to professional and graduate schools have been forced to change their plans. Then too, there were problems, real and imagined, with the continued national commitment to affirmative action. In the case of post-baccalaureate education, the problem of perception seems to have centered on higher education's response to litigation before the Supreme Court in the Bakke case (cited and discussed later), which many believed would have "a chilling effect" upon minority opportunities to pursue graduate and professional degrees. The evidence suggests that public debate on this

case reflected the view that enough had been "done for blacks" and that commitment to strong equal educational opportunity programs was abating in a number of quarters.*

These trends and perceptions notwithstanding, it is the mandate of OCR/ED to encourage compliance with Title VI of the Civil Rights Act of 1964, in this instance through the provision of technical assistance to graduate and professional schools with respect to their minority recruitment, admissions, and financial assistance policies and practices. To understand the dimensions of this problem and possible approaches to its solution, this chapter will explore answers to four questions:

1. The Law: What are the nature and extent of the legal duty of graduate and professional schools to avoid discrimination against minority students and others; i.e., a) what are prohibited discriminatory activities; b) what is the duty to undertake special remedial programs for minority students where prohibited activities against minority students have been engaged in by the school; and, c) what is the permissible scope of voluntary affirmative action programs for minority students (in the absence of prior prohibited discrimination by the school) to remedy the effects of conditions which have limited the enrollment of and benefits to minority students in the school?

2. The Problem: What is the current status of minority group enrollments in graduate and professional schools?

3. Concerns: What are the major issues and concerns raised by graduate and professional school representatives with respect to recruitment, admissions, and financial assistance procedures to improve minority enrollments?

* James E. Blackwell, Mainstreaming Outsiders: The Production of Black Professionals. Bayside, NY: General Hall, Inc., 1981. p.31.

4. Approaches to the Problem: What types of graduate and professional school programs have been implemented, and with what degree of success, to improve minority enrollments?

The individual chapters on recruitment, admissions, and financial assistance which follow explore in greater depth issues with respect to each of these areas and suggest strategies for addressing issues and problems.

1. The Law

What are the nature and extent of the legal duty of graduate and professional schools to avoid discrimination against minority students and others?

This section summarizes the major legal requirements and constraints involved in complying with Title VI of the Civil Rights Act of 1964*, the Federal statute which prohibits discrimination against any person in the United States "on the ground of race, color or national origin" in Federally-assisted programs.** Excerpts from the Title VI regulation, including some concrete applications of Title VI to a number of programs or services ordinarily conducted by graduate and professional schools, are presented in Exhibits 1-3 of Appendix D, along with a list of the specific types of Federal assistance to educational institutions which are covered by Title VI.***

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* Title VI is codified in 42 U.S.C. 2000d. The implementing regulation issued by the Department of Education are in 34 CFR Part 100.

** Intentional or de jure racial segregation in public schools was ruled by the U.S. Supreme Court to be in violation of the victims' rights under the Fourteenth Amendment to the U.S. Constitution in the landmark case of Brown v. Board of Education, 347 U.S. 483 (1954) (Brown I); 349 U.S. 294 (1955) (Brown II).

*** This list (Exhibit 3 of Appendix D) is not complete and current. A complete and current list is not available.

The material in this section is not intended to be an exhaustive legal review or a "how-to" manual. In general, whether specific policies, practices, or acts by Federal aid recipients constitute discrimination in violation of Title VI and the regulation implementing Title VI depends upon an analysis of the specific facts and particular institutional setting. Detailed guidance as to compliance, therefore, should be sought from the Department of Education's Office for Civil Rights. A list of the regional offices where guidance may be obtained is shown in Appendix E.

Our purpose here is to provide graduate and professional schools with a general perspective on the legal requirements and constraints upon them in complying with Title VI's statutory ban on discrimination based on race, color, and national origin in respect to recruitment, admissions and financial assistance. References are made throughout this section to other more detailed sources of information on applicable legal requirements and constraints.

Title VI imposes a duty to undertake affirmative action to remedy the continuing effects of past discrimination. It also permits voluntary affirmative action on behalf of minorities despite adverse impact on non-minorities, but circumscribes its scope where there has not been an official finding that the Federal aid recipient has engaged in discrimination. Although Title VI was enacted for the primary purpose of ending discrimination against blacks and other minorities in Federally-assisted programs, it has been held also to protect non-minorities from discrimination on the basis of race, color or national origin.

The Department of Education is required under the regulation to conduct complaint investigations and compliance reviews of Federally-assisted institutions to ensure compliance and to impose sanctions where voluntary compliance is not secured in

a reasonable period of time. As discussed below, the courts have intervened to ensure that ED carries out such responsibilities to protect the rights of victims of discrimination. It behooves institutions, therefore, to assess their compliance with Title VI and to fashion effective affirmative action plans and measures where necessary. Every graduate and professional school administrator or faculty member with responsibilities for equal educational opportunity should become familiar with the Title VI regulation.

Prohibited Discriminatory Actions

Most graduate and professional schools, whether public or private, receive Federal assistance, and are thus obliged by Title VI to comply with its ban on discriminatory actions as a condition of receiving such aid. The legal prohibition is against both: a) intentional discrimination, and b) actions that have a discriminatory effect without appropriate justification.

Intentionally Discriminatory Actions: Prohibited intentional discrimination includes adverse practices and actions on the basis of race, color or national origin, which are either mandated by law, policy, or custom, or are the result of knowing, deliberate, purposeful actions by Federal aid recipients or their agents. The implementing regulation of the Department of Education prohibits the following specific forms of intentional discrimination:*

> §100.3 Discrimination prohibited.
> (a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied

* 34 CFR Part 100. All subsequent citations from the regulation are from this part of the Code of Federal Regulations (CFR). Excerpts from these regulations are included as Exhibits 1-3 in Appendix D.

the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.

(b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin:

(i) Deny an individual any service, financial aid, or other benefit provided under the program;

(ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program;

(iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program;

(iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program;

(v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program;

(vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section);

(vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

The regulation stresses that the specific activities enumerated are not to be construed as limiting the general ban on discrimination on the ground of race, color and national origin.*

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* Title VI Regulation at §100.3(b)(5). Included in Appendix D, Exhibit 1.

Concrete instances of intentionally discriminatory practices have been found by OCR in public and private colleges, but most notably in the administration of statewide systems of public colleges and universities largely, but not exclusively, in the South. In Adams v. Richardson (currently, Adams v. Bell),* a United States district court ruled that the Government** was required to enforce Title VI against states that it had found to be maintaining racially segregated public institutions of higher education that had previously been segregated by state law or other state action. Pursuant to Title VI, the former Department of Health, Education and Welfare was ordered to require the states involved to desegregate the offending systems of higher education.

The case has continuing relevance to the affected states.*** Also, the desegregation plans submitted by these states contain affirmative action measures that might be of interest to other graduate or professional schools.

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* Adams v. Richardson, 351 F. Supp. 636 (DDC 1972); modified, 356 F. Supp. 92 (DDC 1973); modified and affirmed, 480 F.2d 1159 (D.C. Circ. 1973).

** The action was originally against the Department of Health, Education, and Welfare. After the Department of Education was established in May 1980, responsibility under the Adams order transferred to the new department.

*** The states that are currently implementing statewide desegregation plans monitored by the Department of Education as a result of the above cited and subsequent proceedings are Oklahoma, North Carolina, Florida, Arkansas, Pennsylvania, Georgia, Maryland, Virginia, South Carolina, Kentucky, Delaware and Texas. OCR accepted institutional plans in Missouri and West Virginia. Louisiana, Mississippi, Alabama and Ohio cases were referred by OCR to the Justice Department, which accepted a plan from Louisiana. The Tennessee higher education system is under Federal Court order to desegregate.

Actions with Discriminatory Effects:* Prohibited actions with a discriminatory effect (as distinguished from those that are intentionally discriminatory) run the gamut of those acts or practices that cause a disproportionate adverse impact on persons of a particular race, color, or national origin, and also which cannot be proven by the aid recipient to have some impartial, educational necessity.** "Educational necessity" means proof that there is no appropriate way to achieve the legitimate educational objective, if any, of the challenged practice with less discriminatory effect.

The two key provisions of the Title VI regulation that deal, in whole or in part, with prohibited discriminatory effects are as follows:

> §100.3(b)(2) A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program, or the class of individuals to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided under any such program, or the class of individuals to be afforded an opportunity to participate in any such program, may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect

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* The U.S. Supreme Court in Lau v. Nichols 414 U.S. 563 (1974), an education case, and Guardians Ass'n v. Civil Service Commission of the City of New York 463 U.S. ___, 103S.Ct 3221 (1983), an employment case, upheld the validity of the provisions of the Title VI regulations prohibiting actions having a discriminatory effect on minorities.

** "Educational necessity" in this context is a concept that is analogous to the "business necessity" concept that has emerged from the case law of Title VII. 42 U.S.C. 2000e. See Griggs v. Duke Power Company, 401 U.S. 424(1971).

individuals of a particular race, color, or national origin.

Section 100.3(b)(3) explicitly specifies that actions with discriminatory effects are prohibited:

> §100.3(b)(3) In determining the site or location of a facility, an applicant or recipient may not make selections with the effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination under any programs to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this regulation.

Actions that have a discriminatory effect against minorities continue to be a pervasive problem and discrimination in violation of Title VI may be inferred from consistent minority underrepresentation in graduate and professional schools where contributory practices have not in fact been justified as an educational necessity.

One example of a prohibited discriminatory effect might be a situation in which the graduate or professional school enrolls few minorities compared to their percentage of the age group with baccalaureate degrees within the population served by the school. In addition, nearly all of the recruitment for admission may be done at undergraduate schools which enroll few minorities when there is no educational necessity to confine recruitment to such schools rather than recruiting more broadly at schools where minorities graduate in greater numbers. Another example might be a situation in which minority students receive financial assistance from a school disproportionately in the form of loans, while non-minorities receive, disproportionately, grants or assistantships, and there is no adequate educational justification for this disparity.

It should be emphasized that mere underrepresentation of minorities in a graduate or professional school is not proof per se of discrimination. But such underrepresentation, which exists in many graduate and professional schools, may be a sign that close examination of policies and practices should be instituted to ensure that none of these policies and practices constitutes actions with a prohibited discriminatory effect.

Duty to Undertake Special Programs for Minority Students Where the Institution has Engaged in Discrimination

Schools which are or have been discriminating against minorities must undertake affirmative steps to remedy the continuing effects of such discrimination. This duty arises when there has been a finding of discrimination in violation of Title VI. The Department of Education Title VI regulation provides:

> §100.3(b)(6)(i) In administering a program regarding which the recipient has previously discriminated against persons on the ground of race, color, or national origin, the recipient must take affirmative action to overcome the effects of prior discrimination.

The affirmative steps that may be undertaken in behalf of minorities may adversely impact on non-minority students without violating their rights under Title VI. The desegregation plans submitted by state higher educational institutions in the Adams v. Richardson case, discussed above, contain examples of such remedial measures. For example, to remedy the effects of past discrimination, an institution may be required to use race, color, or national origin as one of several criteria for admission decisions or other purposes*

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* See OCR Policy Interpretation No. 1, shown in Appendix D, as Exhibit 4.

where there has been a finding of discrimination by the school receiving Federal assistance.

Permissible Scope of Voluntary Affirmative Action Programs for Minorities

Although the law does not require affirmative action by a school in behalf of minorities unless the school has been found to have discriminated against them, the Department of Education's Title VI regulation and policy interpretations encourage graduate and professional schools "to continue and expand voluntary affirmative action programs to increase their enrollment of minority group members and to attain a diverse student body" and identify some of the voluntary measures that may be properly undertaken* in light of the Supreme Court's decision in the Bakke case.**

The Title VI regulation provides that:

> §100.3(6)(ii) Even in the absence of such prior discrimination, a recipient in administering a program may take affirmative action to overcome the effects of conditions which resulted in limiting participation by persons of a particular race, color, or national origin.
>
> §100.5(i) Even though an applicant or recipient has never used discriminatory policies, the services and benefits of the program or activity it administers may not in fact be equally available to some racial or nationality groups. In such circumstances, an applicant or recipient may properly give special consideration to race, color, or national origin to make the benefits of its program more widely available to such groups, not then being adequately served. For example, where a university is not

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* See OCR Policy Interpretation No. 1, shown in Appendix D, as Exhibit 4, for examples of permissible voluntary actions. This document is included in its entirety and should be carefully reviewed by graduate and professional school officials.

** Regents of the University of California v. Bakke, 438 U.S. 265 (1978).

> adequately serving members of a particular racial or nationality group, it may establish special recruitment policies to make its program better known and more readily available to such group, and take other steps to provide that group with adequate service.

In the Bakke case, the Supreme Court ruled on one aspect of the permissible scope of voluntary affirmative action on behalf of minority students in the absence of a finding of discrimination against such students by the school involved. The lawsuit was brought by a white male who claimed that a medical school discriminated against him on the basis of race by not admitting him. The U.S. Supreme Court held that the school's voluntary special admissions program for minority students, from which the applicant was barred, violated Title VI and the 14th Amendment to the U.S. Constitution. The Court ruled that strict numerical admissions quotas based on race are illegal where there has been no finding of past discrimination by the school. However, the Court declared that race may be used as one of several factors in carrying out admissions practices.

ED/OCR promulgated its Policy Interpretation of permissible voluntary affirmative action in light of the implications of the Bakke case. In pertinent part it states:

> The Department has reviewed the Supreme Court's decision in Bakke and has determined that voluntary affirmative action may include, but is not limited to, the following: consideration of race, color, or national origin among the factors evaluated in selecting students; increased recruitment in minority institutions and communities; use of alternative admissions criteria when traditional criteria are found to be inadequately predictive of minority student success; provision of preadmission compensatory and tutorial programs; and the establishment and pursuit of numerical goals to achieve the racial and ethnic composition of the student body the institution seeks.
>
> Techniques of this kind are permissible regardless of whether there has been a finding of past discrimination.

Finally, it should be pointed out that as a condition of Federal assistance under another Federal statutory program, schools may be required to undertake special programs to enhance minority enrollments and other opportunities for minorities. For example, the Graduate and Professional Opportunities Program (GPOP) imposes such a duty on schools receiving aid under that program.

The foregoing discussion of legal requirements and the discussion elsewhere in this Handbook of ideas and recommendations emerging from our research and workshops with graduate and professional school representatives should be viewed as a whole by readers of this Handbook in determining particular methods for most effectively complying with Title VI. More detailed guidance for compliance requirements, permissible affirmative action measures, and technical assistance is available from Regional Offices for Civil Rights of the Department of Education. A list of these offices is included as Appendix E to this Handbook.

2. The Problem

What is the current status of minority group enrollments in graduate and professional schools?

Overall, minority enrollment in graduate and professional schools appears to have peaked in about 1976-77. As shown in Table 2-1, gains made to that point have begun to suffer some erosion. Some of the losses in graduate school enrollments of blacks from 1976-1980 have been partially offset by increases in the number of such students entering professional schools, and part of the decline is accounted for by the sharp decrease in part-time study. However, more telling than the numerical shifts are the percentages indicating the number of blacks

Table 2-1

Total and Black Graduate and First Professional Enrollment by Enrollment Status: Fall 1976 - 78 - 80

Year and Enrollment Status	Total		Black		Percent Black of Total
	Number	Percent Change	Number	Percent Change	
	1	2	3	4	5=3/1
Fall 1976					
		(From 1974)		(From 1974)	
Graduate	1,086,334	1.7	65,371	0.5	6.0
Full-Time	431,180	8.2	22,084	*	5.1
Part-Time	655,154	-2.2	43,287	0.8	6.6
First Year	649,865	n/a	41,498	n/a	6.4
First - Professional	245,742	8.5	11,181	-5.4	4.5
Full-Time	221,405	16.0	10,029	7.4	4.5
Part-Time	24,337	-31.6	1,152	-53.6	4.7
Fall 1978					
		(From 1976)		(From 1976)	
Graduate	1,076,980	-0.9	61,923	-5.3	5.7
Full-Time	426,492	-1.1	20,989	-5.0	4.9
Part-Time	650,488	-0.7	40,934	-5.4	6.3
First Year	617,653	-5.0	37,549	-9.5	6.1
First - Professional	256,591	4.4	11,424	2.2	4.5
Full-Time	232,667	5.1	10,260	2.3	4.4
Part-Time	23,924	-1.7	1,164	1.0	4.9
Fall 1980					
		(From 1978)		(From 1978)	
Graduate	1,100,621	2.2	60,059	-3.0	5.5
Full-Time	444,195	4.2	22,143	5.5	5.0
Part-Time	656,426	0.9	37,916	-7.4	5.8
First Year 1/	425,607	n/a	23,339	n/a	5.5
First - Professional	278,443	8.5	12,802	12.1	4.6
Full-Time	251,893	8.3	11,488	12.0	4.6
Part-Time	26,550	11.0	1,314	12.9	4.9

Source: Committee staff analysis, ED/OCR, unpublished data, Fall 1980, and Racial and Ethnic Enrollment Data from Institutions of Higher Education, Fall, 1974; ED/NACBHEBCU, A Losing Battle: The Decline in Black Participation in Graduate and Professional Education, Table 1.

Note: Does not include unclassified students.

1/ Beginning in Fall 1980, the HEGIS survey form was changed by OCR/NCES to register first-time graduate students, rather than first-year graduate students. Thus, trends analysis is no longer possible.

* less than .01.

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enrolled as a proportion of the total enrollments. Since 1976, the percentages of blacks enrolled have, in virtually each instance shown on Table 2-1, decreased or remained constant. Further, while non-black total graduate and first professional enrollments increased by 4% from 1976 to 1980, black enrollments decreased by 5%.

Information on other minority groups indicates their substantial underrepresentation in graduate and professional schools. Table 2-2 depicts the status of minority enrollments in those western states with the largest Hispanic student populations and in the U.S. as a whole. These data can be compared across minority groups and to non-minorities in that part of the country. Except for Hispanics in New Mexico, where they represent 17 percent of graduate enrollments and 20 percent of first professional enrollments, no western state shows a minority enrollment in either of these categories of more than 8.5 percent. With respect to the U.S. as a whole, non-black minorities comprise 5.2 percent of all graduate enrollments and 5.0 percent of first professional enrollments. On the whole, the absolute number of minority students entering the graduate arts and sciences has declined steadily since the mid-1970s.

Law and medical schools show a trend of continuing, but slower, growth in minority enrollments in the two professional disciplines that enroll "significant" numbers of minority students. Tables 2-3 and 2-4 and Chart 2-1 for law and medicine provide a longitudinal picture of the relative stability in these proportions in the respective fields. Again, as with graduate schools, 1976 appears to have been the watershed year, after which minority enrollment leveled off or grew more slowly than had been the case in previous years. However, in the case of black medical school enrollments, there has been a decline since 1975-76.

Table 2-2

Higher Education Headcount Enrollment in the West
by State, Institutional Level and Racial/Ethnic Group
(Fall 1980)

STATE	AMERICAN INDIAN #	%	BLACK #	%	ASIAN #	%	HISPANIC #	%	TOTAL MINORITY #	%	WHITE #	%	TOTAL #
ARIZONA													
Graduate	141	(.9)	175	(1.1)	149	(1.0)	521	(3.3)	986	(6.3)	14,696	(93.7)	15,682
First Professional	13	(1.0)	8	(.6)	13	(1.0)	66	(4.8)	100	(7.3)	1,264	(92.7)	1,364
CALIFORNIA													
Graduate	688	(.6)	4,969	(4.7)	6,949	(6.5)	5,204	(4.9)	17,810	(16.7)	88,532	(83.3)	106,342
First Professional	117	(.4)	1,355	(4.3)	2,310	(7.3)	1,913	(6.1)	5,695	(18.0)	25,863	(82.0)	31,558
COLORADO													
Graduate	42	(.4)	170	(1.4)	154	(1.3)	327	(2.8)	693	(5.8)	11,196	(94.2)	11,889
First Professional	19	(.6)	50	(1.6)	42	(1.3)	112	(3.6)	223	(7.1)	2,908	(92.9)	3,131
NEVADA													
Graduate	7	(.5)	39	(2.6)	25	(1.7)	21	(1.4)	92	(6.2)	1,399	(93.8)	1,491
First Professional	0		0		9	(5.2)	2	(1.1)	11	(6.3)	163	(93.7)	174

Table 2-2 (continued)

STATE	AMERICAN INDIAN #	AMERICAN INDIAN %	BLACK #	BLACK %	ASIAN #	ASIAN %	HISPANIC #	HISPANIC %	TOTAL MINORITY #	TOTAL MINORITY %	WHITE #	WHITE %	TOTAL #
NEW MEXICO													
Graduate	84	(1.5)	71	(1.2)	49	(.9)	970	(17.0)	1,174	(20.5)	4,544	(79.5)	5,718
First Professional	30	(4.7)	8	(1.2)	12	(1.9)	131	(20.4)	181	(28.1)	462	(71.9)	643
TEXAS													
Graduate	344	(0.5)	4,131	(5.7)	1,216	(1.7)	6,154	(8.5)	11,845	(16.4)	60,585	(83.6)	72,430
First Professional	44	(0.3)	592	(4.4)	175	(1.3)	918	(6.8)	1,729	(12.7)	11,860	(87.3)	13,589
UTAH													
Graduate	72	(1.1)	58	(.9)	107	(1.6)	90	(1.3)	327	(4.9)	6,346	(95.1)	6,673
First Professional	9	(.5)	8	(.5)	32	(1.9)	33	(2.0)	82	(4.9)	1,599	(95.1)	1,681
TOTAL U.S.													
Graduate	4,374	(.4)	59,908	(5.9)	23,468	(2.3)	24,240	(2.4)	111,990	(11.1)	896,070	(88.9)	1,008,060
First Professional	1,188	(.4)	12,802	(4.7)	6,106	(2.2)	6,525	(2.4)	26,621	(9.7)	246,890	(90.3)	273,511

Source: National Center for Education Statistics, Survey of Fall Enrollment and Compliance Report of Institutions of Higher Education and Coordinating Board, Texas College and University System, Statistical Supplement, 1981.

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Table 2-3

Minority Enrollment in A.B.A.-Approved Law Schools

	1969-1970	1976-1977	1980-1981
Black Americans	2,128	5,503	5,506
Hispanic Americans	548	2,375	3,012
Native Americans	72	301	415
Asian Americans	N/A	1,324	1,641
TOTAL	2,933	9,524	10,574

Source: Law School Admission Council, The Challenge of Minority Enrollment, Table 2 (Washington, DC: December 1981).

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Table 2-4

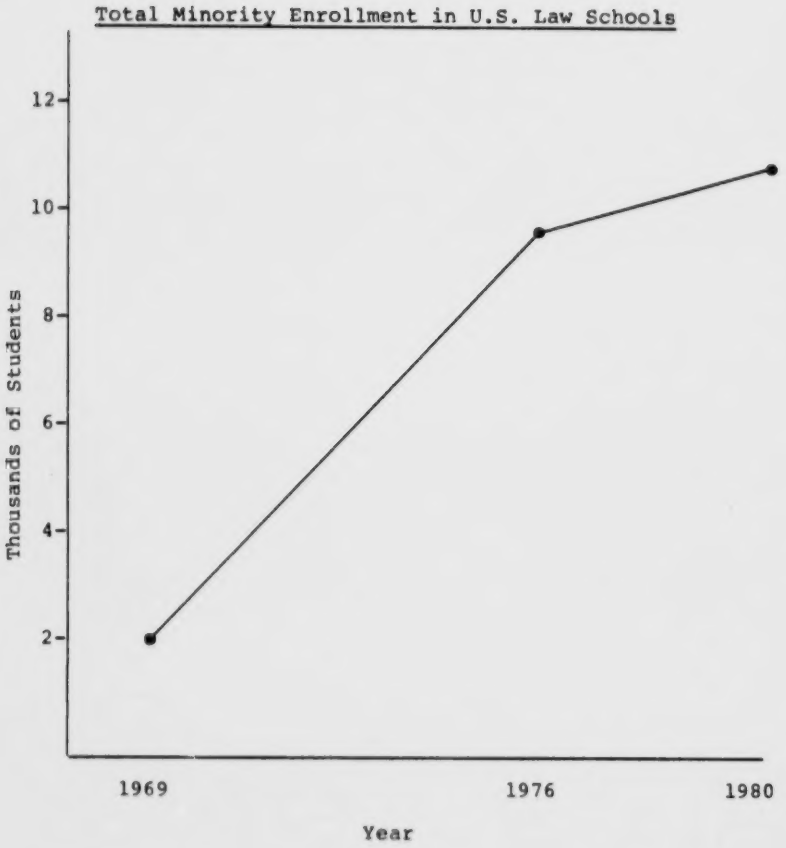
Medical School Enrollment by Race, Ethnicity, and National Origin, 1970 to 1980, as Percentages of Total Enrollment

Racial/Ethnic Group	1970-71	1971-72	1972-73	1973-74	1974-75	1975-76	1976-77	1977-78	1978-79	1979-80
Black American	3.8	4.7	5.4	6.0	6.3	6.2	6.1	6.0	5.7	5.7
American Indian	.04	.1	.2	.2	.3	.3	.3	.3	.3	.3
Hispanic*	.5	.8	1.0	1.3	2.3	2.6	2.8	3.4	3.6	3.9
Asian American	1.4	1.5	1.5	1.7	1.8	1.8	2.0	2.4	2.6	2.8

* For 1970-74 Hispanic includes only Puerto Rican-Mainland and Mexican Americans. For 1974-75, Hispanic includes these two as well as Puerto Ricans enrolled at the University of Puerto Rico. For 1975-76 and 1976-77, Hispanic includes these three groups and students classified as Cubans. Beginning in 1977-78, Hispanic was defined to include any person of Spanish culture or origin.

Sources: Association of American Medical Colleges, AAMC Fall Enrollment Surveys (Preliminary data, 1980).
Institute for the Study of Educational Policy, Howard University, Equal Educational Opportunity Scoreboard, Table 1-14, p. 22 (August 1981).

Chart 2-1



Source: Law School Admission Council, The Challenge of Minority Enrollment, Table 1 (Washington, DC: December 1981).

In sum, the data indicate a decrease in black graduate school enrollments since 1976, with some evidence that the rate of decline has slowed since 1978. A similar pattern holds for black enrollments in medical and law schools. In mild contrast, Hispanic and other minority group students continue to enter professional schools at a modestly increasing rate. Thus, what one sees in the data on minority enrollments since the mid-1970s is an effectively static condition in their proportion of the graduate and professional school student population.

3. Concerns

> What are the major issues and concerns raised by graduate and professional school representatives with respect to recruitment, admissions, and financial assistance procedures to improve minority enrollments?

Graduate and professional school representatives with responsibilities involving the recruitment, admissions and financial assistance of minorities have a variety of general concerns in these areas and numerous implementation questions about the policies and practices necessary to achieve increased minority enrollment in their institutions. Many of the representatives attending the workshops shared a concern for two major problems in the recruitment area: where to find likely candidates for their institutions, and how to attract them to a particular institution once these candidates have been identified. The first of these issues points toward consideration of increased outreach activities. A more detailed examination of this matter is presented in the chapter on recruitment. However, it should be useful to point out that minority students should be sought in a range of settings in addition to the historically black institutions or those to which minority students have traditionally been attracted. Attention should be given to the broad distribution of potential graduate and professional minority applicants on predominantly majority

campuses about whom there are a number of sources of potentially useful information. For example, groups such as the Association of American Law Schools (AALS) and the Association of American Medical Colleges (AAMC) have such data on a broad range of institutions, as do individual universities such as the University of Michigan and Ohio State University.

Attracting students to a particular campus can also benefit from a well-designed recruitment program. One of the most important aspects of such programs is knowledgeable recruitment personnel. In this regard, the issue was raised of whether the race of recruiters makes a difference to the effectiveness of such efforts, but we found in our workshops a broad consensus among participants that it generally does not. A number of participants underscored this view with examples taken from their own experience.

At the same time, workshop members were quite candid in acknowledging that some institutions were likely to encounter particularly difficult problems with minority recruitment efforts because of their locations or lack of proximity to minority communities. But, as one examines the details of designing recruitment, admissions and retention programs, it becomes apparent that they can be tailored so as to emphasize strengths and counterbalance problems that are not subject to easy solution. One straightforward, well-received suggestion was that institutions should be honest with themselves and potential students by acknowledging and discussing such difficulties. Again, representatives from graduate and professional institutions which minority students would regard as isolated and not well-known could cite successes to demonstrate that a well-planned, forthright effort was worth the investment of time and other resources.

Admissions standards and the use of standardized tests introduced another area of concern among workshop participants.

There seemed to be a tendency to rely more heavily and somewhat less flexibly on test scores among some of the less well-known and geographically remote institutions. For this group of schools it seemed especially important to stress that such reliance was inappropriate. Rather, scores should be treated as one of a range of indicators that an institution might employ in an effort to obtain a multidimensional picture of an applicant. Suggestions of other such indicators might include broader geographic representation among students, particular types of personal experience or talents, and the institution's desire for ethnic and racial diversity, all of which are criteria currently utilized by many colleges/universities. And, as institutions like Villanova University Law School or the Medical University of South Carolina suggested, interviews, while raising the cost of a recruitment and admissions program, have proved to be effective additions to admissions processes.

Graduate and professional school representatives were at least equally concerned about retention--how to keep minority students enrolled and making satisfactory progress toward their degrees--as they were with questions on recruitment and admissions. Participants made the point that lack of academic capability was frequently not the main reason minority students decline to complete graduate and professional degrees. Rather, minority students, particularly those on campuses where their numbers are small, appear to find post-baccalaureate education less attractive than do their majority group peers because of the stress they endure while getting their degrees. But because this problem does not appear to be as manifest on campuses where minority group students are enrolled in significant numbers, it suggests the need for careful design of a retention program which addresses non-academic needs of the students.

The prospect of considerable debt burden after completing undergraduate education appears to militate strongly against minority students' willingness to pursue graduate and professional degrees. When this is coupled with the substantial minority employee recruitment efforts of many private firms, one can see that graduate programs, such as those in the arts and sciences, are likely to have limited success in persuading minority students to enter or remain in a Ph.D. or M.A. program. It was not surprising then that representatives of graduate and professional schools regard appropriate financial aid packaging as a major concern. In the main, however, while most participants acknowledged financial assistance to be a particularly difficult issue on their respective campuses, it was not regarded as the principal cause of low minority enrollments. Rather, the inadequacy of an institution's general operating funds was seen as a problem that affected efforts to recruit, admit and retain increased numbers of minority students because graduate and professional schools tended to underestimate or ignore the need for a well-developed grant-in-aid and supportive services program that would help minority students' attempts to become fully functioning members of the campus community. It is for this reason that some member institutions of The Council of Graduate Schools are exerting greater efforts to secure non-Federal funds, in addition to using larger proportions of institutional funds, as they seek to increase their minority graduate and professional student populations.

This array of concerns in the areas of recruitment, admissions, retention and financial assistance has led to the development by graduate and professional schools of several types of approaches to improving their minority enrollments.

4. Approaches to the Problem

What types of graduate and professional school programs have been implemented, and with what degrees of success, to improve minority enrollments?

The research consultations and workshops strongly suggest that the most systematic and best organized practices in the area of recruitment, admissions, and financial assistance of minority students occur in the professional schools. We believe this results from the ongoing involvement of members of the professions, and their organizations and firms, with the institutions that train the members of these professions. We also found that financial assistance and other forms of support for minority students in professional fields frequently derived from external private sources.

Comparable external resources and relationships are less readily available to minority students who enter the arts and sciences. To be sure, the arts and sciences have their own discipline-based associations and societies, but they do not exert the kind of influence (e.g., setting standards for professional school accreditation) on academic departments that is possible for an American Bar Association (ABA) or American Medical Association (AMA). The tradition of decentralized governance of arts and sciences departments also sets them apart from the more unitary governance that is more prevalent in the professional schools. It is also true that the arts and sciences disciplines have tended to rely more heavily on governmental support in their attempts to deal with the recruitment, admission, and financial assistance of minority students, and such support is declining.

Our principal findings are the following:

- Of all graduate and professional schools, law schools show the greatest involvement of the

profession (through the ABA) and the accrediting body (the Association of American Law Schools--AALS) in efforts to improve minority enrollments. The legal profession, operating through the ABA, is the only profession to use minority enrollment as a criterion in its procedures for school accreditation. This involvement gives a strong national policy direction to activities undertaken by the individual institutions and results in a rather high degree of consistency in policy implementation with regard to minority admissions and recruitment by accredited law schools.

- The health professions present a mixed recruitment picture. Medical and dental schools are beneficiaries of national recruitment programs, but implementation is on a campus by campus basis. Strong policy positions supporting increased minority recruitment and enrollment taken by the AMA and the Association of American Medical Colleges (AAMC) enhance the efforts of the individual campuses.

- Professional schools' student recruitment activities tend generally to be rather well organized, and to have substantial involvement from non-campus-based professional associations. In a number of instances their efforts are managed centrally by a national organization in the particular professional field, e.g., the National Action Council for Minorities in Engineering (NACME), or the Consortium for Graduate Study in Management, which is an organization of M.B.A. granting institutions.

- Graduate programs primarily concerned with research-oriented Ph.D.s and the preparation of new members of the community of scholars generally lack well-developed recruitment programs. This observation applies especially to the various liberal arts disciplines and the social sciences.

- In some of the social and behavioral sciences, moderately centralized recruitment programs have been developed by groups such as the American Political Science Association (APSA), the American Psychological Association (APA), and the American Sociological Association (ASA). Of these three, the APA program most nearly approximates those programs just described for the professional schools in terms

of organizational structure and design, program content, and ongoing involvement from the members of the profession. However, unlike the professional schools' programs, the recruitment efforts in the behavioral sciences have depended heavily upon Federal assistance for operational support. And, graduate programs in the behavioral and social sciences continue to rely most heavily upon individual departments for minority recruitment. Should the special funding from Federal sources be withdrawn, it is reasonable to expect a decline in minority representation in these fields.

The Law Schools

The legal community, especially its law school members, has been particularly active in attempting to deal with the problem of minority student underrepresentation. Law schools have taken steps to increase minority enrollment on their own initiative and those actions have been enhanced by requirements promulgated and enforced by their accrediting authorities, the American Bar Association and the Association of American Law Schools. Both of these organizations--the ABA representing the legal profession as a whole, and the AALS, the law school community--have adopted what is known as ABA Standard 212* which requires that each law school, in establishing its case for accreditation, take specific steps that demonstrate concern for those social and ethnic minorities which have been victims of discrimination. Each school is required to engage in special recruitment, admission, and financial aid efforts to increase minority enrollment in law school to a level showing "full opportunity." Indeed, the ABA has recently strengthened its position with regard to this Standard. In a memorandum to the Deans of ABA Approved Law

* Standard 212 of the ABA Standards for Approval of Law Schools by the American Bar Association; adopted Aug.12, 1980, by the House of Delegates of the American Bar Association. Reprinted as Appendix B of The Challenge of Minority Enrollment, Law School Admission Council, Dec.1981.

Schools, the Council of the Section on Legal Education and Admissions to the Bar stated:

> It is the policy of the Council that each ABA approved law school have a written plan describing its program for achieving compliance with Standard 212.
>
> The Council, in accordance with Rule 38 of the Rules of Procedure for Approval of Law Schools and not as an adopted interpretation of Standard 212, directs the Consultant to have each ABA approved law school (1) prepare a written plan by June 1, 1984, describing its current program and the efforts it intends to undertake relating to compliance with Standard 212, and (2) maintain a current file which will include the specific action which has been taken by the school to comply with its stated plan.*

In response to this policy, law schools are in the process of preparing affirmative action plans. The Law School Admission Council (LSAC) has also initiated a sophisticated media campaign to help identify potential law school applicants from the several minority groups.

In brief, the law schools appear not to have found the Bakke decision problematic given their general stance on minority programs prior to the decision; namely, that minority status should be considered in recruitment, admissions, and financial aid programs which seek to enhance minority enrollment.

Nevertheless, according to LSAC, "some minority groups have read the decision in Bakke as a negative statement and assumed that law schools were no longer interested in or willing to

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* American Bar Association Memorandum #D8384-7 (dated Aug. 12, 1983), to Deans of ABA Approved Law Schools, from James P. White, Consultant on Legal Education to the American Bar Association, regarding the Statement of Council Policy.

seek out and admit minority applicants."* Thus, for the last several years, LSAC data show that the pool of applicants to law schools has decreased, and minority enrollments have shown virtually no growth. Interestingly, however, LSAC data also indicate that the objective qualifications of minorities in the overall pool of applicants to law schools have risen in the last few years and the percentage of those minority applicants subsequently enrolled has increased.**

The law schools' approach to this problem has involved systematic, national action as well as regional and institutional action. The principal organizations in national action are LSAC and the Council on Legal Education Opportunity (CLEO).

The LSAC has been described as--

> An organization of the 171 nationally accredited law schools in the United States. Through [LSAC] the law schools jointly operate or control a variety of centralized admission services such as the Law School Admission Test (LSAT) and Law School Data Assembly Service. The Council also carries on extensive research into all aspects of admissions. LSAC, beginning in 1963, embarked upon a program to facilitate access to law school, and to the legal profession, for members of racial and ethnic minority groups. It has sponsored a series of recruiting conferences and tours by law professors, lawyers, and students, offered the LSAT free at a number of predominantly black southern colleges, and authorized fee waivers for other economically deprived applicants, served as a founding co-sponsor of the Council on Legal Education Opportunity, conducted a series of research studies into the possibility of bias in the numerical predictors and into their differential validity, and produced a variety of publications dealing with minority participation in law. The nation's law schools have individually,

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* The Challenge of Minority Enrollment: Seeking Diversity in the Legal Profession., Law School Admission Council, December 1981, p.2.

** Law School Admission Council, unpublished 1982-83 figures.

but overwhelmingly, adopted policies aimed at the same goal of increasing minority enrollment.*

CLEO is an outgrowth of LSAC's work and specializes in a national effort to increase minority enrollments at law schools through the conduct of summer, pre-entry institutes for minority applicants, assistance in gaining admission to member schools, and provision of financial aid to successful applicants. Some business schools, to be discussed in greater detail later in this section, operate a comparable program through the Consortium for Graduate Study in Management.

We believe that the law school community's approach may be an instructive model for other professional schools and graduate schools as well.

The Medical Schools

Minority enrollment efforts by the nation's medical schools are not as strongly influenced by AMA policy as are the law schools by LSAC, AALS, and the ABA. Medical school programs aimed at minorities resemble those of the graduate disciplines (discussed later) in the sense that each campus has substantial discretion in designing and conducting its own activity. The exercise of this discretion results in considerable variety.

In addition, our consultations and research suggest that despite some initial hesitation following the Supreme Court's decision in Bakke, medical schools have continued to exhibit

* Statement of Professor Wayne McCormack of the University of Utah as attorney for LSAC and AALS in amicus brief submitted in the DeRonde case before the California Supreme Court in 1980. The DeRonde case is one of the progeny of Bakke. The special efforts to increase minority enrollment attacked in DeRonde were upheld as valid by that Court. DeRonde v. Regents of University of California 28 Cal.3d 875 (1981).

flexibility in their admissions procedures and a degree of systematic aggressiveness with regard to improving minority enrollments. One of the most serious impediments to these efforts is the weakness in high school and undergraduate science preparation among potential applicants from minority groups. This problem is being carefully examined by a number of organizations, including the Association of American Medical Colleges (AAMC), the Student National Medical Association, the Education Policy Research Institute and ASPIRA.

In keeping with the flexibility just mentioned, a number of medical schools have begun to revise their admission procedures. Medical College Aptitude Test (MCAT) scores are no longer given what was, in numerous previous cases, inordinate weight in the selection process. Factors such as type of employment during the undergraduate career, rural or inner city high school background, economic disadvantage, and exceptional undergraduate grade point average are now assigned greater value in medical school admissions decisions. And, as further evidence of more sensitive selection procedures, it should be noted that the use of personal interviews as part of the admissions process is increasing. Indeed, some institutions have taken the interview a step further by including minority professional students on interview teams.

Another practice encountered in connection with medical school admissions and recruitment, but subsequently found in use by other "hard sciences," was "pairing" a traditionally white undergraduate institution with one that is traditionally or historically black. Students in "paired" institutions attend classes on both campuses, thereby sharing resources and gaining exposure to both student bodies. This practice has the added advantage of addressing the "pool" problem in recruitment efforts by providing the predominantly white institution with an immediately accessible body of potential minority applicants. Pairing may also lessen the need for

some kinds of support services for minority students because the relationship presumably would already have given the minority student a degree of familiarity with the predominantly white campus. This approach to recruitment appears to have most currency in Adams states, but it has the potential for adaptability for arts and sciences programs in states with small minority populations where minority undergraduate students tend to be concentrated in a few institutions.

The Business Schools

The use of consortia is another practice that appears to have gained acceptance among professional schools, particularly business schools, with an interest in minority recruitment. The Consortium for Graduate Study in Management (the Consortium), consisting of six business schools* from around the country, uses common recruiting by faculty from the member schools. In this case, the faculty members are not specifically recruiting for their own campuses, but for the schools in the Consortium and must therefore be quite knowledgeable about the programs at campuses other than their own. The students indicate their own preferences as to the individual institution(s) they wish to consider attending. The commitment of the six universities to minority enrollment is indicated by their willingness to use regular faculty as recruiters, a practice which also has high symbolic value with the potential applicants. The Consortium has a well-structured program for the students that eases the transition between completion of the undergraduate degree and the start of the graduate business program. In addition, with respect to student financial assistance, it is Consortium members'

* Indiana University, University of North Carolina-Chapel Hill, University of Rochester, University of Southern California, Washington University-St. Louis, University of Wisconsin-Madison.

practice to utilize tuition remissions as part of the financial aid program of Consortium students.

The Consortium's approach has the advantage of reducing some of the costs ordinarily entailed in recruitment. However, members of the Consortium do absorb the costs of ten days of recruitment per year by a faculty member. This expense is borne by the individual institutions. Fundraising (12 person-days per year) is also part of the institutions' contribution to the Consortium.

Consortium recruitment seems also to produce a more general dividend in the sense that recruiters inevitably gained a better understanding of the schools and programs from which they recruited. This knowledge could subsequently be of value to the recruitment programs of other graduate and professional departments on their campuses. While problems of launching such a program were noted by participants from graduate arts and sciences departments, they were very much interested in the use of full-time faculty as recruiters.

A plan to consolidate the experiences and skills of groups such as the Consortium, CLEO, and National Medical Fellowships, Inc. represents one of several new activities in the areas of recruitment and admissions that are under consideration in business and other professional disciplines. The proposed new organization would act as a clearinghouse and center for minority students who are interested in one or more of the professional fields. At the same time, such a service would assist professional schools because it would reduce the degree of competition in which these schools now engage as they attempt to cope with the issue of "applicant pool." Other efforts are being considered by the American Assembly of Collegiate Schools of Business (AACSB) and the Graduate Management Admissions Council (GMAC), each of which has formed a minority task force to carefully examine the possibility of

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creating some policy options on minority enrollment and institutional issues.

The Graduate Schools of Arts and Sciences

The graduate schools in the arts and sciences have not approached the issue of minority underrepresentation with systematic programs and external participation such as are found in the professional schools. The decentralization of authority and organization within graduate schools which results in considerable departmental autonomy for each arts and sciences discipline inhibits a focused national and institutional effort. In addition, the professional associations for the arts and sciences disciplines do not have the same role and approach to graduate schools as do such professional associations as the ABA and AMA.

Our research and workshop discussions indicated that the traditional research Ph.D. disciplines continue to experience difficulty in their recruitment, admissions and financial aid practices with regard to increasing minority student enrollment when compared with the professional schools. Part of their difficulty can be explained by the differences in governance and tradition between the graduate arts and sciences departments and the professional schools. For example, the graduate departments in the liberal arts or social and behavioral sciences are, in general, self-governing on their respective campuses and within their disciplines. Thus the graduate department heads wield considerable influence on their campuses, especially when the department has a strong national reputation. Decentralized governance of most major graduate departments is strengthened further by the tradition of academic freedom that characterizes higher education in the United States.

Taken together, these factors suggest that even a strong institutional commitment to improve minority student recruitment and admission may encounter difficulties at the implementation stage if each major division or department does not share the commitment or have the resources to act in terms of it. That commitment must be accompanied by a sustained internal monitoring procedure such as, for example, some form of measurable performance objective based upon affirmative action. Some of the disciplinary associations [e.g., the American Sociological Association (ASA), the American Psychological Association (APA), and the American Political Science Association (APSA)] have created special minority-oriented "offices" and programs aimed at improving minority enrollment in their disciplines, but they have limited effective influence on governance and the decision-making practices of department heads.

The member institutions of the Council of Graduate Schools (CGS) have recently expressed greater interest in the matter of minority student recruitment. Although this interest appears in the context of a more general concern for declining overall enrollments in the graduate arts and sciences, minority students' issues are being raised anew in some of the major Ph.D.-granting institutions. To the extent that graduate schools do initiate a more systematic recruitment effort, minority students stand to benefit from such generalized activities as long as the institutions and departments make their interests in minority applicants known. The workshops revealed this latter point to be a rather consistent problem in the recruitment area; the arts and sciences disciplines generally lack a systematic and aggressive outreach program for minority students. The chapter on recruitment and retention directly addresses steps that may be taken to overcome this weakness.

Several institutions, but a distinct minority among all of those attending the workshops, have adopted what appear to be strong and effective incentives, such as additional program funds or positions, in an effort to encourage their arts and sciences departments to initiate more active recruitment practices. Some noteworthy examples involve the active support of central administration. As these activities were discussed in the workshops, it was clear that programs such as those at the University of Washington and Ohio State University contain a number of the elements which we believe to be crucial to a successful program. The responsibility for the program is placed in a senior administrative office, such as that of a vice-president of the institution, which presumptively gives the activity visibility, legitimacy, and stature in the university community. As important to the program's effectiveness is the fact that "minority affairs" on the campus are treated as a full-time endeavor with a scope that is campus-wide. Thus, the programs have grown, become increasingly successful, and achieved the level of institutionalization they exhibit currently. While these programs may not be appropriate to all campuses, they appear to contain elements that might reasonably be considered by other institutions.

Recruitment

This chapter addresses the policy and practical issues involved in increasing minority student presence in graduate and professional schools from the perspectives of recruitment and retention.* The significance of recruitment in increasing minority graduate enrollment has been widely recognized and documented. As a result, information on how to recruit is readily available. Retention, however, has only recently been identified as a critical component of an institution's "minority affairs" program. Until the past few years, few graduate and professional school staff persons recognized that minority graduate students experience unique obstacles in pursuing their graduate education. Interviews were conducted with more than 200 minorities, either currently enrolled in graduate and professional school or graduates, who identified the following as the most common barriers experienced in these schools:

- unequal access to financial resources between minority and white graduate students;
- difficulty in finding universities which encourage minority students to study and research the problems of their respective ethnic groups;

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* Valuable information and insights for this chapter were provided by the Minority Admissions Recruitment Network (MARN) members.

- lack of institutional legitimization of the research interests of minorities, if they have a minority "focus";
- lack of faculty willingness to serve as mentors/advisors;
- lack of role models at all institutional levels to foster or enhance personal and professional aspirations;
- inadequate support from administrators;
- institutional insensitivity and indifference to minority needs.

These students' sense of obstacles is supported by findings of the Commission on the Higher Education of Minorities. Because of their relevance to our concerns, we cite several excerpts from the Commission's report.*

- Financial aid is terribly important to minority graduate students and has become a critical issue because of declines in federal and private financial support in recent years. Respondents to the Commission's survey of minority educators identified financial concerns as a major obstacle to graduate school attendance. Almost as important as the availability of financial aid was its form. Teaching, administrative, and research assistantships that promote professional development are preferable to loans which do little to encourage students to participate in the apprenticeship that is such an important part of the graduate experience.
- The environment of the graduate institution has a major impact on the minority students' participation in and satisfaction with graduate education. Survey respondents indicated that they were often uncomfortable with the cool, somewhat alien environments of academic departments and research universities. Low minority enrollments and lack of institutional concern for minority students contributed to their sense of isolation and impeded their adjustment.
- Faculty expectations and attitudes constitute a significant part of the graduate and professional experience of

* Final Report of the Commission on Higher Education of Minorities. Higher Education Research Institute, Inc.: Los Angeles, 1982, pp.36-37.

minority students. [Respondents] said that they entered graduate programs feeling stigmatized by their race and ethnicity: minority respondents felt that faculty members all too often assumed that they had been admitted to satisfy affirmative action requirements and that they were less competent than white graduate students. The continual need to prove themselves angered them and contributed to their dissatisfaction with graduate study.

- Faculty often failed to acknowledge, let alone support, minority-oriented research interests and associated cultural values. As graduate students they faced constraints in their choices of research subjects...because of negative attitudes, very specialized concern, and methodological rigidity on the part of faculty.

The development of the format of the recruitment workshop was based on the premise that if graduate and professional institutions desire to implement a relevant minority graduate and professional program, eradication of the above-mentioned elements is mandatory.

An effective and comprehensive minority affairs program then must not only address issues relating to recruitment--in addition to those of admission and financial support--but to retention as well. Merely increasing the number of minority students entering graduate and professional school does not guarantee an increase in the numbers who graduate from these schools. Retention efforts must be joined with those of recruitment as part of an effective, comprehensive minority affairs program.

Before discussing the specific aspects of a well designed recruitment and retention program, a few general remarks concerning the status of minority oriented programs and staff should be made. In order for any institutionally based program to function effectively, it must become an integral component of the ongoing organizational system. This requirement is particularly critical for minority oriented programs. If such programs are to be successful, they must, over time, become institutionalized and acquire the same legitimate

status as other viable programs. With the achievement of legitimate status will come a demand for accountability which applies to other programs. Minority recruitment and retention programs, if they are to be effective, will also be subject to the institution-wide requirements of financial and operational reporting and evaluation. However, institutionalization of a minority recruitment program also brings with it the same commitment, dedication, direction and support which characterize other programs. For example, responsibility for the successful "minority affairs" programs at the University of Washington, Ohio State University and the Medical University of South Carolina has been placed in very senior positions, such as a university vice president or academic dean, which gives the programs visibility and stature in the university community. They also operate as full-time, campus-wide activities.

Equally important to the success of such programs is an appreciation for staffing issues. The person(s) assuming responsibility for these programs must have appropriate credentials. Staff background and capability give the program prestige, posture, dignity, and leadership. At the same time, the salary and prestige of the position(s) must be commensurate with other key administrative positions.

The remainder of this chapter outlines the model elements of an effective minority graduate student recruitment and retention program. Even though the two components are seen as linked in an integrated and interactive program, they are discussed separately for reasons of analysis and clarity.

Recruitment

The model elements of an effective recruitment capability relate both to staff and program characteristics. Program design by itself will not guarantee a successful recruitment

effort. Success depends to a large extent on the skills and characteristics of recruitment staff.

Skills and Characteristics of an Effective Recruiter of Minorities

The skills required of effective recruiters are uncommon. Recruiters must have the capability to operate in an organizational environment which requires differential responses. That is, they must have the skill to perform in a role which is defined by such varying, and sometimes conflicting, characteristics as:

- being a staunch faculty and administration supporter, while also being a strong minority student advocate;
- working continuously to establish and maintain both internal and external recruitment networks;
- being knowledgeable about institutional policies, regulations, resources, environment and status, although, in many instances, having insufficient power to make changes relative to these factors;
- having the realism of a practitioner and the discipline of an academic.

In addition to these skills, participants in the workshops and minority recruitment specialists we consulted pointed to the following as critical characteristics of an effective recruiter.

- ability to develop and maintain the support of senior level administrators;
- ability to negotiate, and authority to make institutional commitments;
- ability to develop and maintain the respect of administration, staff, faculty and students;
- knowledge of such elements of the institutional environment as campus policies, life, and

activities; strengths and limitations of faculty, staff, and administration; financial resources;

- ability to generate enthusiasm with respect to institutional marketing;
- ability to develop and maintain an active candidate resource pool;
- ability to interact effectively with candidates, being especially knowledgeable of and sensitive to cultural and environmental diversity;
- ability to identify candidates with potential in spite of results from traditional assessment instruments and to convince chairpersons and faculty to accept and nurture such students;
- ability to develop and maintain an effective retention program.

Because of the skills and characteristics required to perform recruitment activities successfully, great care must be used in selecting staff for the job. They must possess appropriate qualifications in such areas as education, educational administration, human resources and interpersonal and ethnic relations. However, it is not necessary for a recruiter to be a minority group member in order to be an effective recruiter of minority graduate students. Most workshop participants felt that "master" recruiters are usually effective in any environment for any target group.

Characteristics of an Effective Minority Recruitment Program

As indicated previously, a critical factor in the design and implementation of an effective recruitment and retention program is its placement within the organizational structure of the institution. Specifically, the program should be housed under the aegis of a top administrator. This placement enhances the program by investing it with institutional and administrative legitimacy. Secondly, reporting and evaluation

systems must be incorporated into its design. These systems provide visibility of the program's accomplishments to the institutions' administrators and departmental chairpersons and faculty. Further, as the Commission on Higher Education of Minorities points out, program evaluation is critical in the maintenance of an effective program for two reasons: it provides crucial feedback to guide both program personnel and funding agencies; and it provides objective evidence of program efficacy which can serve to protect the most effective programs in times of budgetary crisis.*

On a more specific level, the critical elements in the design of an effective recruitment program are internal and external networks. The establishment and maintenance of appropriate relationships are essential to program success. Since it is the responsibility of recruitment staff to develop and nurture such relationships, they should play the leading role in the design of the program. Operationally, "networking" is probably the most time consuming responsibility that a recruiter has.

The essential elements of an effective recruitment program are outlined below. The configuration of elements in the design of a specific program may vary considerably in terms of such institutional factors as type of school and its geographical location. Currently, for example, the recruitment programs of professional schools often differ significantly from those of graduate schools of arts and sciences, as discussed in Chapter Two. However, most effective recruitment programs include a number of the features discussed in the following sections.

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* Final Report of the Commission on Higher Education of Minorities. Higher Education Research Institute, Inc.: Los Angeles, 1982, pp.36.

Internal Network: The effectiveness of a recruitment and retention program is based to a very large extent on the staff's capability to establish and maintain an effective internal network.

In addition to organizational factors, essential elements in the establishment and operation of an effective internal network include the following:

- placement of the program under the aegis of a top institutional administrator;
- initiation of good working relationships with senior administrators and department chairpersons, as well as with relevant offices and organizations, including financial aid, admissions, registrar, counseling, placement, athletics, support staff, student groups, clubs, fraternities, sororities, and minority groups and clubs;
- organization and maintenance of an ad hoc committee comprised of administrator(s), department chairperson(s), faculty and student(s) to:
  - assist in establishing program policy and procedures
  - give the program internal support
  - assist in program evaluation
  - give the program recognition, dignity and integrity;
- development and presentation of workshops, seminars, and lectures for administrators, faculty and support staff on such topics as student development, problems of minority students, the implications of behavioral learning problems, and the appropriate conditions for a learning environment; and
- establishment of an internal reporting system to communicate the program's activities and accomplishments to the institution as a whole.

These network elements should be integrated into the design and operation of the retention program.

External Network: The objective of an external network is to generate the requisite resources for the development and maintenance of a minority recruitment pool. An effective recruitment program must be able to provide responses to two questions: (1) Where can minority graduate school candidates be found? and (2) What resources can be identified and utilized in forming a minority recruitment pool? Program strategies, plans and resources must be compatible with responses to these questions, and out of these, an external network appropriate to the objectives of the recruitment effort should be developed.

Often, promising minority graduate school candidates are to be found in other than educational settings, such as in industry and community organizations. Such students frequently choose employment after college over graduate or professional study because they regard colleges and universities as sterile, insensitive, and not designed for their utilization. Moreover, some of these students and their families, particularly first generation college graduates, regard graduate or professional school as unnecessary for professional achievement. These factors indicate a need for identifying candidates in employment and community settings, and also at an earlier stage in their educational history (perhaps as early as secondary school for some fields of study such as science and math) so that graduate and professional school education becomes a part of their thinking as they plan their careers.

In identifying appropriate recruitment sites, there is also a need to look not only at the historically black institutions or other institutions to which minorities have traditionally been attracted, but also at the broad distribution of potential candidates on predominantly non-minority campuses.

Obviously, predominantly white institutions are likely to look first to the historically black colleges (HBCs) and universities for prospective students. In view of their continued importance in producing black undergraduate degree recipients, these 100 or so institutions constitute a ready-made network. Table 3-1 shows the top 20 HBCs in terms of the number of their graduates who earned a Ph.D. between 1975-80.

Unfortunately, these data do not reveal the fields of study in which the Ph.D. was earned. Nevertheless, a recruiting staff should be able to use information of this sort in making some reasonable inferences about how best to design an approach to institutions in this group. In seeking students from the HBCs for their graduate and professional programs, the recruiting institution must also be sensitive to the likelihood of some degree of competition from HBCs which have graduate and professional programs of their own.

While the HBCs do contribute to the size of the applicant pool, recruiting institutions should give closer attention to the potential assistance that predominantly white institutions can provide. Clearly one of the consequences of the heightened minority recruitment efforts of the past several years has been the production of increased numbers of baccalaureate degree holders by predominantly white institutions around the country. Table 3-2 indicates the top 20 predominantly white institutions with respect to their black undergraduates who subsequently received a Ph.D. As we indicated above, these data are only suggestive of the kind of information that an institution might use in designing a recruitment program. A review of the schools in the tables can help an institution to make judgments about the geographic scope of its proposed recruitment effort, for example, and thereby to develop cost estimates for this component of its total program.

As we noted in Chapter Two, another strategy which has been used successfully by medical schools and other "hard sciences"

Table 3-1

20 HBC's Which Granted Baccalaureates to Largest Number Blacks Who Eventually Earned Ph.D.'s, by Rank Order, 1975-80 (with 1980 undergraduate enrollment)

Rank	Baccalaureate Institution	1980 Undergrad. Enrollment	Black Ph.D.'s 1975-80
1	Howard (D.C.)	7,304	215
2	Southern - Baton Rouge	7,211	171
3	Florida A&M	5,012	134
4	Morgan State (MD)	4,163	115
4	Tennessee State	6,412	115
6	Tuskegee Institute (AL)	3,231	103
7	Hampton Institute (VA)	3,018	96
8	Virginia State	3,849	93
9	North Carolina A&T	4,800	92
10	North Carolina Central	3,730	87
11	Fisk (TN)	969	82
11	Jackson State (MS)	5,582	82
13	Morehouse (GA)	1,951	77
13	Alabama State	3,584	77
15	South Carolina State	3,121	68
16	Alcorn State (MS)	2,184	66
17	Arkansas - Pine Bluff	2,928	63
18	Prairie View A&M (TX)	4,595	60
19	Spelman (GA)	1,305	59
20	Alabama A&M	3,535	58

Source: Higher Education Fact Sheet, No.11, Department of Education, National Advisory Committee on Black Higher Education and Black Colleges and Universities (NACBHEBCU), May 1982.

Table 3-2

20 Predominantly White Institutions Which Granted Baccalaureates to Largest Number of Blacks Who Eventually Earned Ph.D.'s by Rank Order, 1975-80
(with 1980 undergraduate enrollment)

Rank	Baccalaureate Institution	1980 Undergrad. Enrollment	Black Ph.D.'s 1975-80
1	Wayne State (MI)	21,591	109
2	Cal. State - L.A.	14,993	64
3	Hunter College - CUNY	11,610	54
4	City College - CUNY	10,215	52
*5	West Virginia State	4,128	47
6	Michigan State	36,781	46
7	Ohio State	41,758	40
7	San Francisco State	18,329	40
7	Univ. of Calif. - Berkeley	21,080	40
10	Southern Illinois	19,306	39
*11	Lincoln (MO)	2,452	38
12	Temple (PA)	17,576	37
13	Indiana	23,353	34
14	Roosevelt (IL)	4,304	33
14	U.C.L.A.	21,817	33
16	N.Y.U.	11,793	32
16	Univ. of Michigan	22,760	32
18	Univ. of Pittsburgh	16,518	29
18	Univ. of Illinois - Urbana	25,944	29
18	Western Michigan	17,501	29

* Historically black institution, but no longer predominantly black.

Source: Higher Education Fact Sheet, No. 11, Department of Education, National Advisory Committee on Black Higher Education and Black Colleges and Universities (NACBHEBCU), May 1982.

in addressing the problem of increasing the applicant pool is "pairing" a traditionally white institution with one that is historically black. This practice provides the former with an immediately accessible body of potential candidates, and may also lessen the need for some kinds of support services for minority students because the relationship presumably would already have given the minority student a degree of familiarity with the predominantly white campus.

In order to develop an external network for recruitment purposes, there are a number of types of external agencies which should be identified. These include:

- minority alumni
- national minority organizations
- organized minority recruitment networks
- majority and minority professional groups
- religious organizations
- public and private secondary schools and teachers
- social organizations
- sororities and fraternities
- community centers
- counseling centers
- talent search organizations.

Professional groups such as the LSAC and AAMC have developed data bases on a wide range of institutions producing students with baccalaureate degrees who might be potential candidates. Individual universities such as the University of Michigan and Ohio State University have also developed recruitment data bases. A list of specific resources which can be utilized in establishing an external network is shown in Exhibit 3-1 at the end of this chapter.

Even though knowledge of where minorities are to be found and resource identification and utilization are central to the establishment of an effective external network, there are other critical factors which must come into play. These include the following:

- development of mechanisms for increasing external agency awareness of institutional offerings such as:
  - provision of opportunities for agencies to visit campuses whenever possible
  - preparation of relevant brochures and other printed materials for agencies
  - development of media publicity
- sponsorship of open houses and career days for prospective students whenever possible
- development of informational materials relating to grants, scholarships, internships, assistantships, etc.
- initiation of a peer-based recruiting mechanism, involving visits to the campuses of prospective minority applicants
- initiation of a faculty-based recruiting mechanism, also involving visits to the campuses of prospective minority applicants
- use of telephone contacts and interviews for potential applicants
- development of private sector contacts
- enlistment of community organizations in sponsoring grants, scholarships or other forms of student support.

The development of an effective recruitment network requires much time and effort. However, once the network has been established, it provides a continual flow of information on potential candidates.

Retention Program

In order to ensure, insofar as possible, the continued enrollment of minority graduate students and ultimately their successful graduation, special assistance must be provided for them. This assistance must respond in particular to their non-academic, as well as any special academic needs and should be developed in the form of a retention program which operates in conjunction with an institution's minority recruitment program and involves the recruitment staff.

An effective retention program should provide, in general, for continuity between recruitment and enrollment as well as a supportive environment. Specifically, its design should include, insofar as possible, the following elements:

- orientation activities involving departmental chairpersons and faculty
- a minority graduate student monitoring and tracking system
- utilization of minority administration and faculty as resources
- financial support opportunities
- internship, faculty assistantship and research assistantship opportunities making possible the development of mentoring relationships
- faculty advisor system
- content based tutorials
- skills workshops (e.g., on test taking and campus survival)
- minority and integrated study groups
- "buddy system"
- opportunities and encouragement to become involved in campus activities

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- a summer program of pre-enrollment and orientation activities which may be residential or non-residential, depending on funding and the geographic scope of the recruitment efforts
- off-campus networks for student referrals (e.g., churches, social organizations, professional groups, banks, businesses and community groups)
- personal counseling (individual and family)
- career counseling
- faculty/staff sensitivity.

Institutions may lack the resources and staff to develop and implement all the features of such a program. However, a serious attempt should be made to design a retention program which addresses the most pressing non-academic and special academic needs of minority graduate students.

Recommendations for Minority Recruitment

By way of summary we recommend the following as approaches to the recruitment and retention of minorities:

- Minority recruitment programs should be institutionalized so that they have the same legitimate status as other viable university programs.
- The responsibility for such programs should be placed in the hands of a senior school or university official.
- The minority recruitment program should be provided with adequate staff and financial resources; staff who have characteristics of effective recruiters should be carefully selected.
- The program should be monitored and evaluated and its accountability to the university official in charge should be ensured.
- An effective internal network should be developed which links the recruitment program to community, state, and national organizations which are involved with or have knowledge about potential minority candidates.

- Formal linkages to historically black colleges, e.g., in a "pairing" arrangement, should be developed.

- Linkages should be identified and developed with undergraduate institutions which have large minority enrollments, and/or data bases on the locations of potential minority candidates.

- Efforts should be made to develop or become a part of a consortium or clearinghouse which has a pool of minority students who could go to one of several schools, or into one of several fields in a school (or schools).

- An effective retention program designed to meet, particularly, the non-academic and special academic needs of minority students should be established.

- A self evaluation of enrollment should be carried out to identify and target the areas in which recruitment efforts could be improved.

Exhibit 3-1

External Network Resources

Alpha Kappa Alpha Sorority, Inc.
5211 S. Greenwood
Chicago, IL 60615
(312) 684-1282

Alpha Phi Alpha
4432 Martin Luther King Drive
Chicago, IL 60653
(312) 373-1819

American Bar Association
1800 M Street, NW
Washington, DC 20036
(202) 331-2200

Association for the Advancement of Black Chemists and Chemical Engineers
Code 691 - NASA
Goddard Space Flight Center
Greenbelt, MD 20770

Association of American Law Schools (AALS)
1 Dupont Circle, NW
Washington, DC 20036
(202) 296-8851

Association of American Medical Colleges
1 Dupont Circle, NW
Washington, DC 20036
(202) 828-0400

Black Nurses Association
P.O. Box 510083
Miami, FL 33151

Cherokee Indians of Georgia
1516 Fourteenth Street
Columbus, GA 31901

Conference of Deans in Black Graduate Schools
Jackson State University
Jackson, MS 39203

Council of Black Architectural Schools
c/o Department of Architecture
Tuskegee Institute
Tuskegee, AL 36088

Council on Legal Education Opportunity (CLEO)
1800 M Street, NW
Washington, DC 20036
(202) 785-4840

Creek Nation of Oklahoma
Box 1144
Okmulgee, OK 74447
(918) 756-8500

Cumberland County Association for Indian People
102 Indian Drive
Fayetteville, NC 28301

Dallas Inter-Tribal Center
336½ Jefferson
Dallas, TX 75208

Delta Sigma Theta
1707 New Hampshire Ave., NW
Washington, DC 20009
(202) 483-5460

Denver Indian Center
1580 Gaylord
Denver, CO 80206
(303) 399-6450

Educational Advancement for Mexican Americans
3702½ North Main
Houston, TX 77709

Florida Governors Council on Indian Affairs, Inc.
521 East College Avenue
Tallahassee, FL 32301

Hispanic Counselors Caucus
APGA
5203 Leesburg Pike
Two Skyline Place, Suite 400
Falls Church, VA 22041

Latin American Educational Foundation
1123 Delaware Road
Denver, CO 80204

Latin American Student Service Organization
Washburn University
1700 College Street
Topeka, KS 66021

Law School Admission Council (LSAC)
11 Dupont Circle, NW
Washington, DC 20036
(202) 387-5750

Links, Inc.
1522 K Street, NW, Suite 404
Washington, DC 20005
(202) 296-1770

Louisiana Office of Indian Affairs
Department or Urban and Community Affairs
P.O. Box 44455 Capitol Sta.
Baton Rouge, LA 70804

Lulac National Educational Centers, Inc.
400 First Street, NW
Suite 716
Washington, DC 20001
(202) 347-1652

Metropolitan Washington Council of Hispanic Agencies
2433 Eighteenth Street
Washington, DC 20004

Mexican-American Legal Defense & Education Fund
(MALDEF)
1411 K Street, NW
Washington, DC 20005

Mid America All-Indian Center, Inc.
The Indian Center
650 North Seneca Street
Wichita, KS 67203

Ministries to Blacks in Higher Education
1209 Beman Street
Augusta, GA 30903

NAACP Legal Defense and Educational Fund, Inc.
806 15th Street, NW
Washington, DC 20005
(202) 638-3278

National Alliance of Black School Educators
1401 Fourteenth Street, NW
Washington, DC 20005
(202) 483-8828

National Association of Black Accountants, Inc.
1642 R Street, NW
Washington, DC 20009

National Association of Black Consulting Engineers
6406 Georgia Avenue
Washington, DC 20012

National Association of Black Journalists
2300 N Street, NW
Washington, DC 20037

National Association of Black Psychologists
P.O. Box 2929
Washington, DC 20002

National Association of Black Social Workers
1969 Madison Avenue
New York, NY 10035
(212) 348-0035

National Association of Black Women Attorneys
1313 H Street, NW, Suite 602
Washington, DC 20005

National Association of
Mathematicians
c/o Department of Mathematics
Atlanta University
Atlanta, GA 31901

National Association of Minority
CPA Firms
918 F Street, NW
Washington, DC 20004

National Network for Women in
Science
c/o American Association for
Advancement of Science
1776 Massachusetts Avenue, NW
Washington, DC 20036

National Organization of Black
University and College Students
c/o Student Government Program
Howard University
Washington, DC 20059
(202) 636-6040

Omega Psi Phi
2714 Georgia Avenue, NW
Washington, DC 20001
(202) 667-7158

Progressive National Baptist
Convention, Inc.
601 Fiftieth Street, NE
Washington, DC 20019

Society of Black Physicists
c/o Department of Physics
Morehouse College
Atlanta, GA 30313

Spanish Education Development
1840 Kalorama Road, NW
Washington, DC 20009
(202) 462-8848

U.S. National Advisory Council
on Indian Education
425 Thirteenth Street, NW
Suite 326
Washington, DC 20004
(202) 245-8060

Chapter Four

Admissions

How an institution, professional school, or graduate department structures its admissions practices can have a significant impact upon its ability to attract minority applicants. For this reason, if for no other, we strongly recommend that admissions personnel be part of the team that is responsible for increasing minority representation. At the very least, graduate and professional schools need to be certain that those staff who manage the recruitment efforts are thoroughly familiar with the admissions process. It is essential, for example, that a recruitment staff know what kinds of programs a given graduate department offers. The particular strengths and weaknesses of the range of professional and graduate schools are other types of information that recruitment personnel need to have in order to help a prospective applicant choose an institution that matches his/her interests.

In this chapter we discuss a number of factors related to the structure, practices, and policies underlying the admissions process that impact upon the success of an institution in enrolling minority students. We also focus upon how the various criteria involved in admissions decisions have bearing upon the evaluation of minority candidates. Special attention is given to one of these criteria--standardized tests--in a discussion of the proper use of standardized tests in conjunction with other admissions criteria.

Admissions Process

The structure of a graduate or professional school itself has an impact on the admission of minority students. Does a graduate or professional school, for example, have a decentralized process of admission where such decisions rest fundamentally with departments, or one which is centralized, with an admissions office coordinating admissions to several divisions? If increasing the number of minority students is an institution-wide goal, then a centralized admissions process presided over by a strong and decisive person with access to key institutional resources is likely to be crucial to reaching that objective. A decentralized process, on the other hand, will tend to increase the variability within the institution with respect to the number of minority students admitted in various areas. That is, the performance of the institution is more likely to be uneven because of differences in departmental attitudes and practices regarding minority admissions. Any systematic approach to increasing the number of minority students at an institution must reflect a sound understanding of the implications and the strengths and weaknesses of its governance.

Potential minority applicants should also be made aware of the relevance to them of a centralized or a decentralized admissions process. For example, in graduate schools, it is, for the most part, the department that makes recommendations for acceptance or denial of admission. Applicants should know that acceptance standards are likely to vary from one department to another within the same graduate school. Applicant knowledge of such a situation could help to reduce some of the confusion that occurs when students, with identical or very similar records, find that their applications have met with different results in different departments of the same institution.

There continues to be a lively debate in graduate and professional schools about the composition of the pool of potential minority applicants. One side of the discussion holds that improved minority enrollment depends upon increasing the number of applications from minority students. The second view takes the position that graduate and professional schools do not receive a sufficient number of applications from qualified minority students. If the institution intends to increase the number of minority students admitted, it is useful to ascertain the perception of the "problem" from the perspective of graduate or professional school deans and department heads. Issues associated with increasing the size of the pool of applicants are addressed in the chapter on recruitment. Concerns raised with respect to the qualifications of minority applicants, however, fall within the purview of admissions because they frequently reflect a hesitancy to look beyond quantitative information, such as test scores and grade point averages, in assessing minority applicants.

By and large, graduate and professional schools do include standardized test scores among their admissions requirements. The controversy surrounding their use, however, reflects a widespread concern about how they are used rather than the fact of their use (although some do argue against the use of such tests). The use of these tests to establish "cut-off scores" below which candidates will not be considered for admission has received some of the strongest criticism. (Issues related to the proper use of test scores are discussed in more detail later in this chapter.) Consequently, fewer schools now engage in this practice. They have begun to use more non-cognitive or non-test data, such as population diversity, in making their admissions decisions. Admissions procedures developed in response to institutional goals for minority enrollment appear to make it more likely that positive results will be achieved. For example, a number of institutions make admissions decisions in stages, initially

placing applicants in action categories, such as "presumptive admit," "no presumption," and "presumptive deny," prior to making final decisions which take account of their minority enrollment objectives. Other institutions establish a percentage of applicants which will be accepted on the basis of grade point average (G.P.A.) and standardized test results, with the remainder of each year's class selected on the basis of the total applicant record.

Graduate and professional schools assist their efforts to increase minority enrollments by ensuring that admissions offices routinely "flag" applications from minority students and make certain that their files are complete. Where required information is missing or incomplete, follow-up procedures should be established to obtain it.

Prospective graduate or professional school applicants need to be informed as to when and where examinations required for admission are given, what fees are involved, and whether an advanced test is also required. They should further be made aware of the possibilities for re-testing if that should prove to be necessary or advisable. If a student presents multiple test results, the graduate department or professional school should have a consistent policy regarding the interpretation of these scores. One frequently employed practice is to use the highest score reported. Other institutions use only the most recent scores. A third approach to assessing multiple results is to average the scores, a strategy that is used by the greatest number of admissions officers. Whatever interpretative policy an institution adopts, it is important that this be communicated to applicants, potential recruits, and recruitment personnel so that it can become an integral part of the effort to increase minority enrollments.

It is important for applicants to know whether the graduate or professional school has a "rolling" or a fixed cycle for

admissions decisions. That is to say, some institutions will make their decisions as applications are received ("rolling"), while others allow applications to accumulate, then set aside a period of time to review all of the files received by the closing date for receipt of applications. In both cases, applicants are eligible for consideration as long as their materials are received before the closing date; but the two processes can have substantially different effects insofar as financial assistance for applicants is concerned. The "rolling" admissions procedure, perhaps inadvertently, favors those who apply early because financial aid and admissions decisions are often made simultaneously, thus shrinking financial aid resources for later applicants. It is important for minority students in particular to know which practice the graduate department or professional school employs because, as discussed in the next chapter, they show a tendency to submit applications later than their non-minority peers.

Graduate and professional schools should find it useful to review their admissions process on a regular basis, using the proportion of minority enrollment as a measure of the effectiveness of their procedures. Such reviews often reveal dimensions of the process which have a particularly salutary impact. For example, institutions have found that admissions committees having some minority representation (faculty and student) show somewhat greater success in enrolling minorities than do those where such representation is not present. These individuals are likely to strengthen the application review process in at least two ways: they can help expand the sensitivity of other committee members to the relevance of some of the admissions criteria to the minority applicant; and in the case of minority students applying from a historically black college or other heavily minority institution, they are likely to have a better understanding of that institution's overall quality and the quality of its graduates. As schools review their admissions process, they should be able to identify

other factors that might enhance their ability to enroll minorities.

Use of Standardized Test Scores in the Admissions Process

Standardized tests such as the Graduate Record Examination (GRE), Law School Admission Test (LSAT), Medical College Aptitude Test (MCAT), Graduate Management Admission Test (GMAT), and others, are part of the admission requirements of many graduate and professional schools. The role that these test scores should play along with non-test admission criteria in assessing the applications of minority candidates is thus a significant issue. The evidence we have been able to assess clearly indicates that test scores can best be used as supplements to the undergraduate record and other sources of information relative to an applicant's ability to undertake graduate and professional work. Test scores are valuable in that they represent an index of ability that is based upon exposure by all candidates to a common measure. Like all measures of academic potential, however, test scores are less than perfect, and should never be the sole criterion upon which an admissions decision is made, for they can never measure the totality of factors that are related to an individual's ability to achieve in an academic program. Factors such as persistence and commitment cannot be assessed by paper and pencil measures but are crucial to success in graduate and professional study.

Standardized admissions test scores are useful as predictors of first year grades. They have little or no utility as predictors of success in a particular profession. Indeed, the predictive strength of test scores decreases over time. That is to say, predicting an applicant's ability to succeed over the long-term based on test scores is a fairly risky proposition. Assessing the predictive value of test scores is further complicated by the fact that, according to many

educators and researchers, the first year is the most difficult in an academic program, particularly for minority students who often encounter more intensive problems than nonminorities in adjusting to both the academic and social factors in the new situation. Those who hold this position contend that first year grades for minority students are often depressed because of adjustment concerns, and may not be an accurate measure of ability.

Since tests are less than precise instruments, those who use them in decision-making should exercise caution. A number of admissions testing programs have developed and disseminated guidelines for the use of scores from their respective tests. Copies of those issued by Educational Testing Service (ETS) and the Law School Admission Council (LSAC), which are representative, appear as Exhibits 4-1 and 4-2 at the end of this chapter. These guidelines clearly state the limits and appropriate uses of test scores. Those who are involved in admissions decisions should be familiar with those guidelines and should adhere to them.

There is some evidence that the problem of overreliance on tests is greater than the problem of underutilization of test data. It is often assumed that the tests can do things that even the test producers never intended they could. Specifically, users of tests often believe that even small score differences between applicants can accurately determine who will perform effectively and who will not. Institutions often rank applicants by test scores and offer admission only to those candidates who score above a specific point. This use of rigid "cut scores" is not a sound practice and is one that has been discouraged by major test producers.* Score

* See, for example, Guide to the Use of the Graduate Record Examinations Program 1983-84, Educational Testing Service, Princeton, N.J., 1983.

differences have to be of considerable magnitude to be considered reliable indicators of real differences in performance. Illustrative of this fact is the GRE General Aptitude Test. On that test the verbal ability section has a standard error of measurement (index of measurement error) of 35 points. A second measure, the standard error of measurement of score differences, is 50 points for the verbal ability section. These two statistics clearly indicate that rather than view an individual's score as an absolute, precise measure, that score should be seen as a range which exists as a result of measurement error rather than applicant ability. Therefore, modest score differences (less than the standard error) really are not indicators of differences in ability to perform.

In the case of minority applicants, extreme caution should be exercised in using test scores as a part of the admissions process. Often minority applicants have had educational and cultural experiences different from those of their majority peers. In such cases the test scores earned are likely to be less accurate as measures of true ability than the scores earned by majority applicants. It should also be noted that the samples of minority students used in these studies of test performance have been very small and further research must be done before test users will be able to feel confident as to the precise interpretation of minority applicants' test scores.

It should be clearly recognized by all admissions decision-makers that utilization of standardized test scores in isolation from other admissions criteria is a misapplication of their intended purpose. They must be assessed along with a variety of other admissions criteria to reach a judgment about the overall "picture" of potential presented by each candidate. A number of these non-test admission criteria are discussed below.

Non-Test Criteria for Admissions

The most common of the non-test criteria for admission are the applicant's grades or grade point average (G.P.A.). However, because undergraduate institutions and departments vary in quality and are known to differing extents by graduate or professional school faculty, similar grades earned by students from different institutions may receive differential evaluations. For example, the grades of black students from predominantly black institutions, which tend to be unfamiliar to many predominantly white institutions and their faculties, may not be treated as presumptively equal to grades earned at an institution which is better known to members of an admissions committee. This inequity can be corrected if admissions committees thoroughly familiarize themselves with historically black institutions. Participation in the admissions process by minority faculty, students, and/or staff is one way to begin this effort.

The personal statement is another criterion that admissions committees should carefully assess in order to compile a complete picture of a minority applicant. These statements often reveal characteristics of applicants indicative of their potential for advanced study. For example, since minority applicants tend to be somewhat older than non-minorities when they start graduate or professional school, qualitative information reflecting skills and abilities obtained in previous employment, perseverance, and commitment to pursuit of a field of study can be of greater value to the committee's decision-making than test scores or G.P.A. Admittedly, personal statements are sometimes less useful than they could be because students may emphasize personal information at the expense of their research or professional interests. These latter areas are those in which an admissions committee is likely to be most interested, for discussion of such points tends to produce material useful in determining an applicant's

suitability for graduate or professional work in a particular field. However, "softer" personal information is often instructive, and should not be overlooked.

Another source of information about applicants for admission is the letter of recommendation. Many admissions officers maintain that despite the widespread use of these letters, recommendations frequently fail to serve their intended purposes. That is to say, the letter or form does not contribute to a better understanding of the applicant and his/her abilities and potential. Two explanations were offered by workshop participants to account for this situation.

First, quite often faculty members submit recommendations for students whom they do not know sufficiently. As a consequence their references are general and superficial. While such references may be well-meaning, their very superficiality may be construed negatively by an admissions committee. The referee should keep in mind that his/her assessment of a student will be read by several people, and in the case of minority applicants they are often re-read several times. However, if the recommender does not know the applicant, searches of his/her letter for evidence of the candidate's potential will be fruitless. And, it is sometimes unfortunately the case that while these recommendations may reflect more on the writer than their subject, improper inferences about the quality of the applicant are also made. Therefore, if one is asked for a reference by a student whom he/she does not know, the simplest response is to decline. The referee can explain his/her reasons in a very straightforward manner with few or no ill effects. Indeed, a denial can be turned to good use if the student can be directed to an alternate source for the needed recommendation.

The second explanation offered for the limited usefulness of letters of recommendation for minority students is that,

especially on predominantly white campuses, they tend not to develop the kinds of relationships with faculty members that allow the faculty to get to know them and their abilities well. Students will often approach a professor from whom they received a good grade in a freshman or sophomore course but with whom there has been no subsequent contact, and will thus be given the type of recommendation just discussed. Students must recognize their own responsibilities in this area and seek recommendations from professors in whose courses they did well and who have a view of their movement through a B.A. or M.A. program so that the recommendation can reflect a developmental perspective. When a faculty advising system is effective, it is a potentially good source for such references.

Failing this resource, however, students should discuss their post-baccalaureate plans with professors in as much detail as possible to help them determine if they can write an informative recommendation. Such a discussion may also help the instructor to advise the student on options that might not have been considered in regard to schools or particular programs that may match more closely the student's interests and talents. In short, minority students must be somewhat more aggressive in pursuit of academic self-interest than they have tended to be, especially on predominantly white campuses, in order to obtain recommendations that can enhance their prospects for post-baccalaureate careers. In turn, faculty should be forthcoming and decline to write a reference if they do not feel adequately acquainted with the student. This response can be more beneficial than harmful to a student.

Finally, with respect to letters of recommendation, just as grades from lesser known institutions sometimes pose evaluation problems, so too do letters of recommendation from such institutions. As with the assessment of grades, a particular problem is posed here for students from the historically black colleges (HBCs). Again, we encourage graduate and profes-

sional schools to make the effort to get to know the institutions from which their current minority students come. This effort could be undertaken as a part of the regular review of the admission process mentioned earlier in this chapter.

For some institutions, interviews of prospective students have proved to be a useful means of overcoming the perceived weaknesses of letters of recommendation. Costs, of course, are a major constraint on the general adoption of this practice. However, many of those graduate and professional schools which employ interviews as part of their admissions process do so on a selective basis. These institutions have generally made preliminary assessments of the applicants and believe the interview to be worth its cost since it will help reach a firm judgment about an applicant's potential. In the case of institutions which have defined their recruitment area as being within reasonable proximity to their campus, we believe that greater use of personal interviews could be of significant value, at an affordable cost. A somewhat less effective, but still useful method, is establishing contact with minority applicants by telephone.

It is important to note that, as in the case of standardized tests, systematic studies have not been carried out to determine whether there is a predictive relationship between non-test admissions criteria and success. Thus, it cannot be said that minority applicants' qualifications with respect to any admissions criterion do or do not predict success either in graduate or professional school or in later careers. Northwestern University has initiated a detailed examination of its entire graduate population for the past decade. The University expects to be able to identify a number of specific non-test predictors of graduate school success at the conclusion of this investigation.

We encourage other institutions to undertake such studies, particularly of their minority enrollees and graduates, to determine the relationship, if any, between non-test admissions criteria and indicators of success. We also urge them to implement validation studies of the standardized tests they require for admission to ascertain the relationship between scores and later performance.

Absent such data at the present time, we urge graduate and professional schools to develop admissions procedures which incorporate a range of non-test admissions criteria supplemented by the appropriate use of standardized test results. Such a process will help institutions to enroll minority applicants who meet their standards of quality. The words of one admissions officer should be particularly borne in mind: "Admissions decision-making is an art--not a science."

Recommendations for Minority Admissions

To summarize, we recommend that the following approaches to minority admissions be considered:

- All members of admissions committees should be provided with adequate guide materials (e.g., GRE Guide) for using test scores.
- Admissions committees should use a formula that includes both quantitative and qualitative data.
- No single factor, including test scores, should determine admissions eligibility.
- Decision-makers should keep in mind that test scores may predict first year grades, but they do not predict performance in subsequent years or career success.
- Non-test admissions criteria should be carefully reviewed when assessing applicants.
- Admissions procedures should be reviewed on a regular basis.
- Wherever possible, admissions committees should have minority (faculty/student) membership.

- Admissions requirements and the admissions process should be fully understood by recruitment personnel.

- Admissions committees should establish measurable performance standards as aids to assessing their achievements.

- Institutions should attempt to undertake validation studies of their standardized admissions tests, and also studies to determine what relationship exists between non-test admissions criteria and indicators of success in and after graduate and professional school.

Exhibit 4-1

Guidelines for the Use of GRE Scores*

Introduction

These guidelines have been prepared by the Graduate Record Examinations (GRE) Board to provide information about appropriate score use for those who set criteria for admissions and interpret scores and to protect students from unfair decisions based on inappropriate uses of scores.

The guidelines are based on the following premises:

- The Graduate Record Examinations are designed to assess academic knowledge and skills relevant to graduate study, and the scores from these tests, when used properly, can improve the graduate education process.

- The GRE Board has an obligation to inform users of the scores' strengths and limitations, and users have a concomitant obligation to use the scores in the most appropriate, rather than the most convenient manner.

- A GRE score is but one of a number of types of information relevant to graduate education and should not be used in isolation.

A GRE test's primary asset is that it provides a measure of academic skills with high quality technical characteristics and known descriptive statistics. A GRE test has two primary limitations: (1) It does not and cannot measure all the qualities important for undergraduate achievement, graduate study, and other pursuits whether in education, careers, or other areas of experience, and (2) it has psychometric limitations: only score differences of certain magnitudes are reliable indicators of real differences in performance. Such limitations should be taken into consideration as the test scores are used.

Although these guidelines deal specifically with GRE scores, the same cautions and limitations apply to virtually all admissions variables, such as grades and recommendations.

More information about each of the points covered by these guidelines may be found in the Guide to the Use of the Graduate Record Examinations Program.

*Revised and approved by the Graduate Record Examinations Board, September 1982.

Specific Guidelines for Use of GRE Scores

1. Use Multiple Criteria.

It is a policy of the GRE Board that multiple types of information should be used when evaluating an applicant for graduate study. No single measure--and this includes the GRE tests-- assesses every discipline-related skill necessary for academic work, not all subjective factors important to academic and career success such as motivation, creativity, and interpersonal skills. Therefore, all available pertinent information about an applicant should be considered in making a decision. In view of the breadth of information relevant to judging success in graduate education, the GRE Board believes it is inadvisable to reject an applicant solely on the basis of GRE scores. Hence, a cutoff score below which every applicant is categorically rejected without consideration of any other information about that person should not be used.

2. Establish the Relationship between GRE Scores and Performance in Graduate Programs

Institutions using GRE scores in the admissions process are encouraged to examine the relationship between test scores and measures of performance in their academic programs. To assist in this, a Validity Study Service is available to user institutions free of charge through the GRE Program. Information on further validation procedures can be obtained from the technical standards on testing of the American Psychological Association, American Educational Research Association, and National Council on Measurement in Education.

3. Review Test Content.

A GRE Subject Test score should be required or recommended only after a careful review of test content has indicated that the test measures knowledge or skills that are clearly appropriate and important for admission into the graduate program. Arrangements to borrow confidential inspection copies of tests may be made with the GRE Program office.

4. Avoid Comparisons across Tests.

   a. Ordinarily, Subject Test scores should be compared only with other scores on the same Subject Test. (For example, a 450 in Biology is not equivalent to a 450 in Education).
   b. Percentile ranks should be compared only if they are based on the same reference group.
   c. GRE scores are not directly comparable with scores on other graduate admission tests.

5. Recognize Limitations of Scores Earned on Tests Taken under Special Conditions.

Depending upon the nature and extent of the disability, a handicapped student's scores may not reflect educational achievement fully; in addition, the GRE Program is not able to provide appropriate interpretive data for scores earned in nonstandard administrations of the tests. The incapacitating nature of some students' disabilities may make it advisable to waive GRE score requirements.

Use of the GRE

The GRE General Test is designed to measure broadly defined verbal, quantitative, and analytical skills. The Subject Tests have been developed to reflect material usually associated with undergraduate curricula, and they are particularly appropriate for educational users in which the undergraduate subject area is relevant. Both the General Test and the Subject Tests are appropriate for use in admitting students for graduate study and in making fellowship awards. They may also be used for predicting success in graduate school and for guidance in counseling students in their courses of graduate study.

Other uses of the General Test or the Subject Tests are inappropriate unless validated for that purpose by the user.

Exhibit 4-2

Excerpts from the Law School Admission Council's (LSAC) Cautionary Policies Concerning Use of:

I. The Law School Admission Test (LSAT)
II. The Law School Data Assembly Service (LSDAS)
III. The Law School Candidate Referral Service (LSCRS)

This statement is intended for those who set policy and criteria for admission, interpret LSAT scores and LSDAS reports, and use other Law School Admission Council (LSAC) services. It is intended to minimize unwise or undefensible uses of these services by law schools, and to protect applicants from inappropriate treatment and unfair decisions based on improper use of the services.

Application to law schools is an anxiety-producing process at best, and results in misunderstanding and criticism of law schools, the LSAT and the LSDAS. Attention to the following caveats should help meet much of the criticism, and help place law schools in a defensible position in the event of litigation. It must be understood that this short statement is necessarily selective and limited. Law school admissions officials should study the additional information available in two LSAC publications, the Legal Affairs Manual and the Operations Reference Book.

I. THE LAW SCHOOL ADMISSION TEST

Because the LSAT is administered to all applicants under standard conditions and requires the same or equivalent tasks of everyone, LSAT scores provide a standard measure of abilities. This permits comparison of a law school's applicants both with other applicants to the same school and with all applicants who have taken the test. However, while LSAT scores serve a useful purpose in the admissions process, they do not measure all the elements important to success at individual institutions. They must be examined in relation to the total range of information available about a prospective law student. It is in this context that the following restraints on LSAT score use are commended:

A. Do Not Use the LSAT Score as a Sole Criterion for Admissions

The LSAT score should be used as only one of several criteria for evaluation and should not be given undue weight solely because its use is convenient. Admissions officers should always keep in mind the fact that the LSAT does not measure every discipline-related skill necessary for academic work, nor does it measure other factors important to academic success.

B. Do Not Rely on the LSAT Without Testing Its Predictive Utility at Your School; Validity Studies

The LSAT score should be used only when there is a demonstrated relationship between scores and actual performance in the user law school.

Quantitative data used in the selection process should be validated regularly so the law school can use LSAT scores and other information most effectively. The Law School Admission Council offers an annual Validity Study Service to schools, at no charge, for this purpose.

C. Do Not Use LSAT Scores Without an Understanding of the Limitations of Such Tests

Admissions officers and members of admissions committees should be knowledgeable about tests and test data and should recognize their limitations. Such limitations are set forth in the Operations Reference Book and are regularly discussed at workshops sponsored by the Law School Admission Council.

D. Avoid Improper Use of Cut-Off Scores

Cut-off LSAT scores (those below which no applicants will be considered) are strongly discouraged and, in any event, should be used only if choice of the particular cut-off score is based on a carefully considered and formulated rationale (for example, one based on clear evidence that those scoring below the cut-off have substantial difficulty doing satisfactory law school work.) Note that the establishment of a cut-off score will often involve distinctions based on score differences not substantial enough to be reliable (see Paragraph E below), and may have a greater adverse impact upon applicants from minority groups. Normally, an applicant's LSAT score should be combined with the undergraduate grade point average before any determination is made about the applicant's probability of success in law school.

E. Do Not Place Excessive Significance on Score Differences

Scores should be viewed as approximate indicators rather than exact measures of an applicant's abilities, and distinctions should be made among applicants on the basis of scores only when score differences are reliable. The three-digit reported LSAT score may create an impression of precision not justified when the admissions official understands the standard error of estimate in the test, as discussed in the Operations Reference Book.

F. Do Not Misapply an LSAT Score Requirement to Handicapped Applicants

Many handicapped applicants are unable to take the LSAT; they

should, without prejudice, be considered on the basis of other information available. Some other handicapped persons may furnish LSAT scores which, because of testing conditions, may not be fully comparable to the scores of other applicants. Both these matters are considered in some detail in the Operations Reference Book.

G. Do Not Misuse Repeater Scores

Recent research indicates that when an applicant has taken the LSAT more than once, the average of the scores has more predictive validity than any one of the separate scores unless special circumstances are present. In the absence of such circumstances, a decision to use one of the separate scores rather than the average is probably unwise.

H. Avoid Encouraging Use of LSAT for Other Than Admissions Functions

The LSAT was designed to serve admissions functions only, and has not been validated for any other purpose. It is subject to misunderstanding and misuse in other contexts, as in the making of an employment decision about an individual who has completed most or all law school work. These considerations suggest that LSAT scores should not be included on a law school transcript, nor routinely supplied to inquiring employers (the Buckley Amendment would preclude the latter, without the student's specific authorization, in any event).

Financial Assistance

This chapter presents information on the major issues relative to financial assistance for minority students, especially those issues which impinge on recruitment, retention, and admission to professional and graduate schools. In addition to presenting an overview of the financial aid delivery system, the chapter speaks directly to problems that seem to have a differential impact on minority students. Because of the vulnerability of minorities to changes in national economic trends, appropriately packaged financial assistance can be an essential feature in the aggregation of factors that influence the minority student's decision to pursue graduate or professional study.

This chapter includes, first, an overview of sources and types of financial aid; second, a summary of our findings from field research and regional workshops on approaches to the problems of minorities with respect to dealing with financial assistance; and third, a discussion of the issues related to the articulation of financial assistance with recruitment and admissions.

Types of Financial Assistance Available to Graduate and Professional Students

The range of financial assistance at the graduate level is broad. Financial assistance staff should take into account

the full range of available aid in fashioning creative financial packages which will help minority students meet their special circumstances. The following generalized descriptions provide basic information on the various types of financial assistance available to students at the graduate or professional school level.

Fellowships, scholarships, and grants: These are usually outright awards which may range from a few hundred to perhaps several thousand dollars, with no service to the institution required in return. Fellowships and scholarships are usually awarded on the basis of merit and are highly competitive. Grants are awarded on the basis of financial need or special talent in a field of study. Many of these awards not only cover tuition, fees, and supplies but also include stipends for living expenses with allowances for dependents. However, the terms of each award should be examined because some do not permit recipients to supplement their income with outside work. Awards also may vary in the number of years they may be used.

There are several Federally funded fellowship programs. The best known of these are the Graduate Professional Opportunities Program (GPOP) and the fellowships from the National Institute of Mental Health (NIMH) which are directed to students in the various mental health specialties. In psychology, for example, the NIMH fellowships are the basis of the program administered by the American Psychological Association (APA). GPOP fellowships, on the other hand, can be awarded to the broad spectrum of graduate and professional fields (see Table 5-1). The choice of specific fields depends upon GPOP requirements and the areas proposed in the applications from the various universities.

Other federal fellowship programs include the Health Careers Opportunity Program (HCOP) in the Department of Health and

Table 5-1

Graduate and Professional Opportunities Program
Fellowships in Academic/Professional Area
FY 1982

Academic Year 1982-83

	Total & %	B	H	NA	AA	MW
Engineering	176 17.8%	77	23	2	13	61
Physical Sciences	179 18.1%	75	37	0	10	57
Life Sciences	161 16.3%	88	29	5	15	24
Social Sciences	160 16.2%	95	31	7	5	22
Humanities/Fine Arts	14 1.4%	6	3	2	2	1
Psychology	62 6.3%	42	10	0	2	8
Professions:						
Law	156 15.8%	100	45	6	4	1
Business	66 6.6%	50	6	1	2	7
Education	15 1.5%	2	6	7	0	0
	989	535	190	30	53	181

	% of Total
B - Black	54.1
H - Hispanics	19.2
NA - Native Americans	3.0
AA - Asian Americans	5.4
MW - Majority Women	18.3
	100.0

Source: Graduate & Professional Opportunities Program, Bureau of Graduate Educaton/U.S. Department of Education.

Human Services; the National Science Foundation Minority Graduate Fellowship; and the National Research Council Fellowships. Of these, HCOP is notable in that, among other program features, it encourages linkages of graduate and professional health career programs with community groups, undergraduate schools, and secondary schools for the purpose of identifying and supporting minority students who are interested in a health career.

Loan programs: The two major student loan programs are the Guaranteed or Federally Insured Student Loan (GSL/FISL) program and the National Direct Student Loan (NDSL) program. Guaranteed or Federally Insured Loans are available through banks and, in some cases, from institutions of higher education. Students must pay a five percent origination fee, which is deducted from the proceeds of the loan. Loan repayment is deferred while the student is in school and for a grace period of up to six months after studies have been discontinued. The government pays interest benefits for students while they are in school and for the grace period. After the grace period, interest begins to accrue at a nine percent simple rate. The repayment period is normally ten years, with repayment generally on an equal monthly installment basis. A shorter repayment period may be required if a student borrows a small amount and pays the minimum monthly installment of fifty dollars.

If a student is dependent on his or her parents for support and total family income is $30,000 or more, the need for and amount of the GSL/FISL loan will be determined by Graduate and Professional School Financial Aid Service (GAPSFAS) or another Federally approved need analysis system. The provisions of the NDSL program are similar, with some important exceptions. NDSLs are available only through institutions of higher education, and the interest rate is five percent. Also, the lower interest NDSL funds are in shorter supply than GSL/FISL funds

and must, according to government regulations, be awarded on the basis of financial need. Therefore, schools often award NDSLs as supplementary loans of last resort to the neediest students. Table 5-2 shows a listing of federal student financial aid funds, and the funding levels for each from fiscal year 1982 to fiscal year 1984.

Assistantships: The graduate and professional schools have a broad array of fellowships and assistantships which usually provide full or partial tuition remission and perhaps a stipend for expenses. Assistantships are usually of three types:

- Teaching assistantships which generally require some specified amount of undergraduate teaching, grading of papers or laboratory supervision. Ordinarily these positions are reserved for advanced graduate students and may or may not be regarded as an integral part of a formal degree program.

- Research assistantships which resemble teaching assistantships in that some amount of service to the institution is required. Typically, the service rendered is within the students' area of specialization and, in some cases, the work done can be used to satisfy a portion of the requirements of a degree program.

- Dormitory and counseling assistantships which are also common forms of financial aid. These are frequently awarded to graduate students in fields such as counseling, psychology, and social work. In these assistantships a number of institutions may include tuition waivers as well as room and board.

College Work-Study Program: In addition to Federal loan programs, there is another notable source of Federal assistance for graduate and professional students, namely, the College Work-Study Program, or CW-S. It provides on-campus jobs as well as some off-campus employment opportunities in selected categories of private non-profit organizations. Like the major Federal loan programs, eligibility for CW-S jobs is

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Table 5-2

Federal Student Financial Aid Funding:

Fiscal Year 1982 Approved Levels, ED Amendments of 1983 Authorization, Administration Fiscal Year 1983 Budget, Fiscal Year 1983 Final Approved Levels, ED Amendments and Fiscal Year 1984 Authorization, Administration's Fiscal Year 1984 Budget

Title IV Programs*	FY 1982 Approved Levels	ED Amendments '83 Authorization	Admin's FY'83 Budget	FY'83 Final Approved Levels	ED Amendment's FY'84 Authorization	Admin's FY'84 Budget
Pell (Entitlement Program)	$2.419b	($2,300 maximum award)[1]	$1.4b	$2.419b	($2,500 maximum award)	$2.7b ($3000 maximum award)
SEOG	355m	440m	Terminate	355m	460m	Terminate
NDSL	179m	475m	Terminate	179m	550m	Terminate
CW-S	528m	760m	397.5m	540m	800m	850m
SSIG	73.7m	150m	Terminate	60m	200m	Terminate
GSL (Entitlement Program)	3.0b	Entitlement[1]	2.484b	3.100b	Entitlement	2.047b
Fellowships	8.6m	60m[2]	Terminate	10.0m	60m[2]	Terminate

See following page for notes to this table.

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[1]Entitlement programs, i.e., programs for which the enabling legislation mandates a specific formula for determining the amount of funding, are funded at final cost levels arrived at on the basis of the formula.

[2]ED Amendments specify $60m for FY'81 and '82, and sums as necessary for FY'83 and '84.

* Title IV of the Higher Education Act of 1965.
Full names of these programs are as follows:

- Pell (Formerly Basic Educational Opportunity Grant-BEOG)
- SEOG - Supplemental Educational Opportunity Grant
- NDSL - National Direct Student Loan
- CW-S - College Work-Study
- SSIG - State Student Incentive Grants
- GSL - Guaranteed Student Loan

Source: Table developed from figures provided in U.S. Department of Education's Budget Briefing Document for Fiscal Year 1984, January 31, 1983.

based upon financial need. During discussions with workshop participants, it was pointed out that in spite of being need-based, CW-S was being used by some institutions as a way to increase the number of teaching and research assistantships they could make available because they were no longer restricted to using it solely for hourly wages. Although most financial aid offices tend to think of CW-S funds as being principally for undergraduates, a number of graduate and professional school administrators have aggressively moved to modify this assumption. Graduate and professional institutions such as Washington University - St. Louis, Columbia University and Northwestern University have been notably successful in securing increased CW-S funds for post-baccalaureate students and in their use of these funds for assistantships. That more graduate and professional schools have not used CW-S in this manner underlines the need for individuals responsible for increasing minority enrollments at that level to become more familiar and involved with their campus' financial aid system.

Problems of Minority Students in the Financial Aid Process: Approaches to Solutions

In developing financial aid packages for minority students, financial assistance staff should be aware of several critical patterns in the post-baccalaureate career profiles of these students. To the extent that financial aid packaging can be planned so as to counteract some of the trends noted in the following series of facts, more minority candidates may be encouraged to enroll and expeditiously complete graduate or professional school. While these points are particularly relevant to minority students pursuing graduate programs in the arts and sciences, they also have a bearing on students in professional programs:

- A larger proportion of minority than majority students enroll in these programs on a part-time basis.

- Minority students in Ph.D. programs tend to show more discontinuity; that is, they more frequently withdraw and seek readmission to the programs than do majority students.

- In general, as Table 5-3 indicates, minority group students take longer to obtain the Ph.D. degree than do their majority group peers. For example, black students take about 3.5 years more than white students to complete a Ph.D. program (13.0 years vs. 9.4 years). This is longer than for any other group of students.

- Perhaps, as a consequence of the above, minority group students as a whole are significantly older at the time they receive the doctoral degree than are their majority group colleagues (see Table 5-3).

- Native Americans, blacks and Mexican Americans tend to be largely self-supporting in graduate school. Over 70 percent of the graduate students from each of these groups use their own, or their spouse's earnings to pay for their post baccalaureate studies (see Table 5-3).

- At the same time, these students can count much less on family contributions to help defray the cost of their Ph.D. studies. While the median figure receiving family contributions is 15.9 percent, Native American, black and Mexican American students are significantly below this figure, as follows: 6.9 percent, 10.8 percent, 7.8 percent respectively (see Table 5-3).

Deciding to apply for aid: The decision to apply for financial aid is often a difficult one. Many students who are planning to attend graduate or professional school are not sure if they should apply for aid because: 1) they did not receive financial aid as undergraduates, 2) they are unsure of the qualifying personal and/or family income levels, and 3) they have heard that financial aid resources are limited for graduate and professional students. These three points summarize many of the problems that emerged from our field research and during our workshop discussions on the use of financial assistance in enhancing minority enrollment in graduate and professional schools. The question of applying

Table 5-3

Doctoral Recipients Among U.S. Citizens by Race, Ethnicity, Sex and Selected Demographic Variables, 1981

	U.S. Total	Native American	Asian	Black	Puerto Rican	Mexican American	Other Hispanic	White
Total Number	24,990	89	460	1,007	115	154	195	21,911
Male (percent)	65.3	65.2	67.6	49.2	49.6	66.2	59.5	65.8
Female (percent)	34.7	34.8	32.4	50.8	50.4	33.8	40.5	34.2
Median Age at Receipt of Doctorate	32.4	36.3	32.7	37.3	33.9	35.0	32.9	32.2
Median Time Lapse Between BA and PhD (in years)	9.6	11.6	9.8	13.0	11.4	10.9	9.9	9.4
Source of Graduate School Support *								
Teaching Assistant	45.6	31.5	42.0	25.7	27.8	36.4	48.7	47.4
Research Assistant	33.8	13.5	43.3	15.4	23.5	22.1	21.0	35.1
Own/Spouse Earnings	69.1	77.5	53.7	73.3	57.4	71.4	63.1	70.4
Family Contributions	15.9	6.9	16.5	10.8	10.4	7.8	15.9	16.6
Postdoctoral Study Plans Definite (percent)	14.1	6.7	18.3	4.3	9.6	9.1	10.8	14.6
Postdoctoral Employment Plans, Definite (percent)	59.3	66.3	49.6	66.0	70.4	61.0	56.9	59.9

* Percentage of all graduate students receiving given type of support

Source: National Research Council, Summary Reports: Office of Scientific and Engineering Personnel, Doctorate Records File, Table V, 1981.

for financial aid is important because a large number of minority students seem to believe that in doing so they lessen their chances of acceptance. There are three aspects to this problem, each with adverse consequences for minority admissions efforts.

- If the student does not believe that funds are available, he/she is less likely to apply.
- If the student believes that requesting aid will lessen the chances of admission, the probability of applying for aid is reduced.
- The student deliberately overestimates personal or family resources in applying for aid, thus reducing the size of any potential award. According to workshop participants, this matter of overestimation is viewed by minority students as a way to enhance their chances of acceptance for admission.

There is therefore a special need among minority students (and their families) to have accurate information about the financial aid process. It is equally important that financial aid personnel, who are in a position to do so, enhance the effectiveness of minority recruitment programs by making sure that recruiters know details of the financial aid process. This information should in turn be explicitly communicated to potential candidates for admission and aid who need to be able to assess whether their plans for financing post-baccalaureate study are realistic. For example, minority applicants tend to overestimate their potential earnings from employment (non-CW-S) during the summer recess and the academic year due largely to a lack of familiarity with the demands made on their time by a graduate or professional program. We found, from discussions with workshop participants and students themselves, that a number of them had little preparatory information on the nature of graduate and professional study and how these differed from an undergraduate degree program. Since they also knew little about the types of available financial aid, their plans for financing their education were often infeasible and unnecessarily burdensome to themselves.

The importance of financial assistance to an institution's success in increasing its minority enrollment cannot be overestimated. It is clearly one of the most tangible demonstrations of the graduate or professional program's commitment to the effort. And even though potential minority group applicants may be hesitant, or indeed, may not know to ask questions about financial assistance, recruitment and financial aid staff should be prepared to provide information that will help to address the following kinds of issues:

- Does the financial aid package meet the full need at institution x, or is there a remaining gap that the student will be expected to fill?
- What will be the approximate size of the loan component, and what are the repayment terms?
- What amount of summer earnings contribution is expected from the student and will the institution help the student to find summer employment?
- What are the institutional or program requirements for a student to be in "good standing"? Do these differ depending upon the composition of the financial aid package?
- Is a part-time student eligible for financial assistance? What constitutes full-time status in the particular program of study selected by the student?
- Does the composition of a financial aid package change over time, i.e., will the package consist of a larger proportion of loan as the student nears the end of the degree program?

Late application for financial aid: Another problem of minority students is the matter of timeliness in beginning financial aid application procedures. This appears most frequently at those institutions, such as the Ivy League schools, which combine the admissions process with financial aid decisions. If minority students believe that applying for financial assistance will negatively influence the institution's decision on admission, they may delay applying for financial aid.

If, after admission, they then apply for financial aid, they run the risk of receiving a small proportion of grant funds in their financial aid packages. This problem of an inappropriate mix of fund sources in the financial package may be compounded by the difficulties that minority students encounter when they attempt to secure the part-time employment on which most financial aid packages are predicated. Of course, the institution will cover the resulting shortage with an equal amount of loan funds, but at this point the student will have two problems, both stemming from the lack of timeliness in initiating the financial aid process: 1) lower availability of grant and fellowship money (resulting in more loan funds); and 2) a late start in the constricted job market for minorities (also resulting in greater loan usage). The consequence for minority students in these circumstances is that they tend to reach the institution's loan ceiling more rapidly than their majority peers, raising the specter of being over-burdened by debt.

Since reluctance to acknowledge financial need has been documented by members of our workshops, it is urged that, from the outset, minority students be forthrightly informed that acknowledging the need for financial assistance will not jeopardize their chances for admission. They should also be encouraged to apply for aid as early as possible so that, at the point of being accepted, the financial package will be formulated. Students can then determine the portion of their expenses they will be required to supply through earnings or other sources. If it is necessary to seek employment, their chances of success are much greater when the process is started early.

The debt burden issue: Our research confirmed that, as a group, minority graduate and professional students have a strong bias against incurring debt through student loan programs. In part, this view seems to be an acknowledgement of the continued difficulties which face minorities in the job

market and the associated problems of repaying such debts. But it also may reflect minority group parents' unwillingness to enter the loan market. This point is more complicated than it seems because a good part of this parental reluctance may result from their lack of understanding of the value of graduate education. As a number of the workshop participants noted, it is still the case that sizeable proportions of the graduate and professional pools are the first members of their families to attend college.

However, the amount of debt burden that graduate and professional students can and should carry has been the subject of considerable discussion within the higher education community and elsewhere for a number of years. The question has been raised in particularly acute form in the past five years in examining the rising cost of professional degree programs. Thus, during the course of our workshops, medicine, law and business schools were, not unexpectedly, especially sensitive to this matter.* As Table 5-4 and Chart 5-1 show, the greatest amount of education-related debt is carried by medical students. However, even taking into account their higher than average debt burden, we found paradoxically that minority students, as a whole, have a low total debt even though they seem to be most affected by the rising cost of graduate and professional schools. Explanations seem to lie in the aforementioned reluctance to incur debt and the fact that minority students generally receive a larger proportion of grant and work-study funds in their financial aid packages than do their majority peers. They also tend to rely somewhat more on their

* There was an interesting associated matter that seemed most prevalent among the dental schools who sent representatives. For these schools, the student assistance program is affected by what appears to be a weakening in the financial resource base of dental schools generally. Thus, for several dental schools among our participants, student financial aid issues existed in the larger context of concern for institutional well-being.

Table 5-4

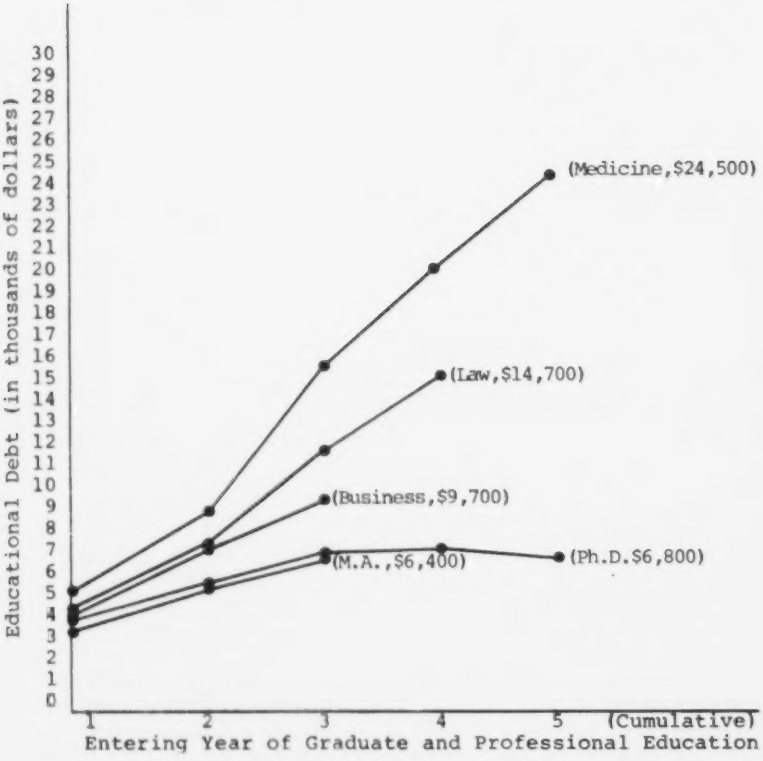
Median Borrowing of Graduate and Professional Student Financial Aid Service Filers by Field, Year Entering School, and Estimated Cumulative Total, All Students

Field	Year 1	Year 2	Year 3	Year 4	Year 5-6	Estimated Cumulative Total
Business	$4,100	$7,000				$ 9,700
Law	4,700	7,400	$12,000			14,700
Medicine	5,000	9,500	15,700	$20,000		24,500
Arts & Sciences Ph.D	4,500	5,000	6,800	7,000	$6,800	
Humanities	4,400	6,500	6,400	5,800	7,000	
Social Sciences	4,200	5,000	6,500	8,400	7,600	
Biological	4,700	5,000	5,000	8,000	5,200	
Physical	5,000	4,000	5,000	400	4,300	
Other	4,500	5,000	6,800	6,000	7,700	
Arts & Sciences Masters	4,000	5,200				6,400
Humanities	4,200	5,900				7,600
Social Sciences	4,100	5,200				6,300
Biological	4,000	6,000				8,000
Physical	3,500	5,000				6,500
Other	4,300	5,500				6,700

Source: Adapted from Table 10 in Terry W. Hartle and Richard Wabnick, The Educational Indebtedness of Graduate & Professional Students (Princeton, NJ: ETS, July 1983).

Chart 5-1

Median Student Indebtedness, for GAPSFAS Applicants



Source: Terry W. Hartle and Richard Wabnick, The Educational Indebtedness of Graduate & Professional Students, Chart 1 (Princeton, NJ: ETS, July 1983).

own or spouse's income to finance graduate and professional education.

In developing financial assistance programs for minority students, financial aid officers should minimize, to the extent possible, the proportion of loan funds in the total package, while optimizing such sources as fellowships, scholarships, grants, assistantships, and college work-study funds. The financial aid staff should consider taking on a bit of the role that is played by financial counselors. It is important that these staff make clear to the student the precise nature of the long-term obligation he/she is assuming. This point may seem to be an obvious one to the professional, but students can sometimes lose sight of the obvious, especially in the context of completing the requirements of a rigorous graduate or professional degree program. We therefore suggest to institutions that they minimize, to the extent practicable, the loan portion of financial aid packages for minority students. The minority professional's lower lifetime earning power should be considered when arranging for the minority student to assume a debt which may be more onerous to him than to his majority peer.

While it is assumed and is generally true that advanced degrees bring increased earning power, it continues to be the case that the lifetime earning potential of minorities lags behind that of whites. And paradoxically, the extent of this lag appears to increase with the amount of education. An example of this lag, based only on the lifetime earnings of males (a similar table for females was not available) is shown in Table 5-5.

Thus, the same amount of total debt can represent quite a different amount of long-term burden to minority and non-minority students completing the same degree program.

Table 5-5

Estimated Lifetime Incomes From Age 18 to 64 for Males by Race and Educational Attainment

Level of Schooling Completed	Lifetime Income		
	All Males	White	Nonwhite
Elementary			
Less than 8 years	$248,000	$263,800	$189,000
8 years	$301,000	$316,200	$227,700
High School			
1-3 years	$338,000	$355,600	$259,600
4 years	$416,000	$424,500	$335,400
College			
1-3 years	$474,000	$479,800	$403,000
4 years	$609,000	$616,400	$480,800
5 or more years	$705,000	$712,100	$598,200

Source: Adapted from Lillian Dean Webb, "Cost Benefit Analysis: An Accountability Asset," Journal of Educational Finance, Vol. 2, No. 3, Fall 1976, p. 217.

Mentoring: Graduate and professional student aid should also reflect a deeper understanding of the post-baccalaureate educational experience of minorities. For them, assistantships are especially important for reasons beyond those having to do primarily with financial support. Teaching and research assistantships provide significant opportunities to develop working relationships with professors in the various disciplines. The "mentoring" which these opportunities can create oftentimes makes career advancement easier after a graduate or professional degree has been received. It is also the case that the mentoring relationship makes a valuable contribution to the quality and character of the educational experience by more securely integrating students into their campus communities and academic/professional disciplines. The workshop participants agreed that mentoring was generally valuable, particularly so to students in the arts and sciences and those pursuing research and academic Ph.D. degrees.

Because of the importance of mentoring to minority students, non-white faculty and members of some of the professions in predominantly white institutions are giving increased attention to the development of such relationships and the role that they--though in scarce supply at some institutions--can play in fostering them. These minority faculty members recognize that their presence on largely non-minority campuses can be an attraction for minority students who, once enrolled, should be engaged in productive, mentoring opportunities. The efforts of these minority faculty are an indicator of their interest in developing supporting networks that may be beneficial in sustaining or increasing the minority presence--both student and faculty--in the various disciplines and professions.

Articulation of Financial Assistance with Recruitment and Admissions

One of the major insights arising from the nine regional workshops was that financial aid offices in most institutions

tend to work in isolation from recruitment and admissions staffs. Yet when the student first has contact with a recruiter from a graduate or professional school, one of the issues which may loom large in his mind is the availability of financial aid. If the recruiter is informed about the basic types of support that are available, appropriate information can be conveyed at that time. Without such information, the prospective minority student may not further pursue graduate study opportunities, based on the mistaken assumption that financial assistance is too limited to be sought.

When financial assistance personnel, recruiters, and admissions office staff exchange information and work as a team, they all become more broadly informed and more helpful to minority graduate candidates. Each has insight and information which can contribute to the overall effort to increase minority representation in their institution. Workshop participants discussed a number of problems which, while nominally part of the financial assistance process, were relevant to recruitment and admissions functions as well. As these problems were discussed, it was clear that their resolution could be aided, through a team approach, by any member of the team who had a relationship with the potential minority applicant for professional or graduate study.

The following examples illustrate issues which may be alleviated through articulation.

Availability of financial aid: There is an unfounded belief among the public and even in the academic community that there are no longer any Federal funds to support student aid in graduate and professional schools. While contraction has occurred in certain quarters, the situation is not as bleak as purported. Since, as we have previously pointed out, the availability of financial assistance can be the linchpin which holds together the student's plan to pursue professional or

graduate study, it is essential that accurate information be available as early as possible. Also, the availability of state government and major private sources of financial aid should be made known to minority applicants. Financial aid staff may need to take the initiative in informing recruitment and admissions personnel of the type of assistance available, application deadlines, and other relevant facts which will enable them to provide more help to minority candidates for graduate study.

The impact of need for financial assistance on admission: As stated earlier, many minority students mistakenly assume that the need for financial aid will negatively influence admission decisions. If reassurance on this matter is extended at the earliest possible point in the recruitment process, the student will be in a position to avoid the pitfalls described earlier in this chapter. Again, recruiters may not be informed of the seriousness of this issue unless there is teamwork among recruitment, admissions and financial assistance staff.

Information required for financial aid application: It is extremely helpful to the prospective graduate or professional student to be given information about the financial aid application requirements. For example, the question of whether or not the student is independent or dependent on his/her family will need to be determined. Some students who have, in effect, been independent as undergraduates, may nevertheless define this question narrowly and indicate that they are dependent. In this event, information on the parents' income and assets must then be provided and tax records for the year prior to beginning study must be produced, often creating delays if they have not yet been gathered. Workshop participants also noted that the applicant's estimation of assets has proven to be a frequent problem. Taken as a whole, lower income families tend to overestimate the value of their assets, while higher income families underestimate them.

Parents and students should be counseled on the negative effect of overestimating the value, for instance, of their homes, pointing out that in so doing, they may be considered eligible for less aid. On all of these matters, recruitment and admissions staff should be as knowledgeable as financial aid personnel.

Demands of a graduate program: Many minority graduate students have little awareness of the demands of a graduate program. This lack of knowledge often comes into play in relation to employment and the estimates the student makes of his/her ability to contribute to self-support while earning an advanced degree. The program may look deceptively light if class attendance alone is taken into account. Many students penalize themselves unduly by applying for too little aid, working too many hours and finding themselves with literally no time to sleep. Therefore, it is essential that realistic information be conveyed about the demands of the program, by whoever is in touch with the student. These are only a few instances where articulation may highlight the ways in which candidates can be assisted more fully in gaining admission to graduate and professional schools with a viable financial aid package.

The amounts and types of financial assistance offered to minority students is a sensitive area that requires the involvement of the administrative structure of a graduate or professional school. The combination of need- and merit-based assistance for minority students has led to some institutions being more successful than others in attracting minority candidates. Authority for awarding need-based aid usually resides in the financial aid office while merit assistance is usually awarded by a faculty committee or the dean. A comprehensive team approach is needed to bring the entire process together.

Recommendations for Minority Financial Assistance

The findings and conclusions set forth in this chapter lead us to the following recommendations with respect to the financial assistance of minority students:

- Graduate and professional school financial aid personnel should be more active participants in the allocation of Federal financial assistance on their campuses.
- Financial aid personnel should be integral parts of a coherent recruitment and retention program.
- Financial award decisions should be made as close to the notification of admission as possible.
- Timeliness of applications for financial assistance should be stressed to potential minority group applicants.
- Financial aid personnel should work more closely with centralized financial aid services to determine more clearly if minority student problems with their data collection instruments reveal a pattern that needs more careful investigation.
- To the extent practicable, college work-study and institutional funds should support assistantships and fellowships for minority students because they can enhance the creation of mentoring relationships.
- Debt levels of minority graduate and professional students should be carefully monitored since equal levels of debt can mean different degrees of debt burden.
- Aid officials need to be alert to racial/ethnic group differences in resource, expense and debt profiles of graduate and professional students in determining the composition of financial awards.
- Student aid officials need to stay abreast of developments in the federal government, state government, and major private sources with respect to the financial assistance delivery system because changes in these areas can affect flexibility of decision-making on the individual campuses.

Recommendations

This Handbook has attempted to present specific suggestions for graduate and professional schools to consider as approaches to improving their minority enrollments. It is important to bear in mind that what have been set forth here are issues to be taken into account and strategies to be considered by institutions in their efforts toward this end.

Solutions to the problems of increasing minority enrollments have not been offered, nor would it have been appropriate to do so, for institutions vary infinitely in their needs and in what will "work" for them. However, awareness of salient issues in the areas of recruitment, admissions, and financial assistance, and recourse to a range of suggested approaches to each, can assist graduate and professional school administrators to define appropriate activities for their institutions. Therefore, we recapitulate below, without further discussion, our recommendations for approaches to recruitment, admissions, and financial assistance that can be tailored to particular institutional needs for improving the enrollment of minority students in graduate and professional schools.

Recruitment of Minority Students

1) Minority recruitment programs should be institutionalized so that they have the same legitimate status as other viable university programs.

2) The responsibility for such programs should be placed in the hands of a senior school or university official.

3) The minority recruitment program should be provided with adequate staff and financial resources; staff who have characteristics of effective recruiters should be carefully selected.

4) The program should be monitored and evaluated and its accountability to the university official in charge should be ensured.

5) An effective internal network should be developed which links the recruitment program to community, state, and national organizations which are involved with or have knowledge about potential minority candidates.

6) Formal linkages to historically black colleges, e.g., in a "pairing" arrangement, should be developed.

7) Linkages should be identified and developed with undergraduate institutions which have large minority enrollments, and/or data bases on the locations of potential minority candidates.

8) Efforts should be made to develop or become a part of a consortium or clearinghouse which has a pool of minority students who could go to one of several schools, or into one of several fields in a school (or schools).

9) An effective retention program designed to meet, particularly, the non-academic and special academic needs of minority students should be established.

10) A "self-evaluation" of enrollment should be carried out to identify and target the areas in which recruitment efforts could be improved.

Admissions of Minority Students

1) All members of admissions committees should be provided with adequate guide materials (e.g., GRE Guide) for using test scores.

2) Admissions committees should use a formula that includes both quantitative and qualitative data.

3) No single factor, including test scores, should determine admissions eligibility.

4) Decision-makers should keep in mind that test scores may predict first year grades, but they do not predict performance in subsequent years or career success.

5) Non-test admissions criteria should be carefully reviewed when assessing applicants.

6) Admissions procedures should be reviewed on a regular basis.

7) Wherever possible admissions committees should have minority (faculty/student) membership.

8) Admissions requirements and the admissions process should be fully understood by recruitment personnel.

9) Admissions committees should establish measurable performance standards as aids to assessing their achievements.

10) Institutions should attempt to undertake validation studies of their standardized admissions tests, and also studies to determine what relationship exists between non-test admissions criteria and indicators of success in and after graduate and professional school.

Financial Assistance of Minority Students

1) Graduate and professional school financial aid personnel should be more active participants in the allocation of Federal financial assistance on their campuses.

2) Financial aid personnel should be integral parts of a coherent recruitment and retention program.

3) Financial award decisions should be made as close to the notification of admission as possible.

4) Timeliness of applications for financial assistance should be stressed to potential minority group applicants.

5) Financial aid personnel should work more closely with centralized financial aid services to determine more clearly if minority student problems with their data collection instruments reveal a pattern that needs more careful investigation.

6) To the extent practicable, College Work-Study and institutional funds should support assistantships and fellowships for minority students because they can enhance the creation of mentoring relationships.

7) Debt levels of minority graduate and professional students should be carefully monitored since equal levels of debt can mean different degrees of debt burden.

8) Aid officials need to be alert to racial/ethnic group differences in resource, expense and debt profiles of

graduate and professional students in determining the composition of financial awards.

9) Student aid officials need to stay abreast of developments in the Federal government; state government; and major private sources with respect to the financial assistance delivery system because changes in these areas can affect flexibility of decision-making on the individual campuses.

We hope that these recommendations will be found useful by graduate and professional schools as they seek to improve minority enrollments in their institutions.

Appendices

APPENDIX A: Selected Bibliography and Resource Guide on Minority Enrollment in Graduate and Professional Schools

APPENDIX B: Individuals and Organizations Consulted

APPENDIX C: Technical Assistance Workshops for Graduate and Professional Schools on Recruitment, Admissions and Financial Assistance of Minorities

APPENDIX D: Exhibits: OCR Regulations and Policy Interpretation #1

APPENDIX E: Office for Civil Rights Regional Offices

APPENDIX A

A SELECTED BIBLIOGRAPHY AND RESOURCE GUIDE ON MINORITY ENROLLMENT IN GRADUATE AND PROFESSIONAL SCHOOLS

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APPENDIX B

INDIVIDUALS AND ORGANIZATIONS CONSULTED

American Association for the Advancement of Science (AAAS), Shirley Malcom, Office of Science Opportunities

American Association of Collegiate Registrars and Admissions Officers, J. Douglas Conner

American Association of Community and Junior Colleges (AACJC), Carl Crawford, Chairman, Council on Black American Affairs; Constance Sutton

Association of American Medical Colleges, Dario Prieto

American Association of State Colleges and Universities, Harold Delaney, Executive Vice President

American Council on Education, Reginald Wilson, Director, Office of Minority Affairs

American Optometric Association, Millicent Gorham

American Political Science Association, Maurice Woodard, Director, Committee on the Status of Blacks; Thomas Mann, Executive Director

American Psychological Association, Minority Affairs Program, James Jones, Director

ASPIRA, Gladys Carillon, Acting Director

Association of American Law Schools, John Bauman, Executive Director

Black Education Discussion Group, Reginald Wilson

Clark College, Atlanta, Elias Blake, President

Consortium for Graduate Study in Management, St. Louis, Wallace L. Jones, Director

Council of Graduate Schools, Michael Pelczar, Executive Director

Council on Legal Educational Opportunity (CLEO), Linda Flores, Director

Dillard University, Daniel Thompson, Professor of Sociology

Emory University, Atlanta, Robert Etheridge, Vice President for Affirmative Action; Carol Thigpen, Associate Dean of the College

Hispanic Higher Education Coalition, Carlos Arce

Indiana State University, Mary Ann Carroll, Dean, School of Graduate Studies

Indiana University, Bloomington, Charles Bonser, Dean, School of Public and Environmental Affairs

Law School Admission Council, Bruce Zimmer, Executive Director and R. Paul Richard, Director of Minority Affairs

National Action Council for Minorities in Engineering (NACME), Wayne Owens

National Association for Equal Opportunity in Higher Education (NAFEO), Daniel Thomas

National Association of Schools of Public Administration and Public Affairs, Joseph Robertson

National Association of Student Financial Aid Administrators (NASFAA), Constance White, Associate Director; Dallas Martin, Executive Director

National Commission on Student Financial Assistance, Richard T. Jerue, Executive Director

National Conference of Black Political Scientists, Lucius J. Barker, President

National Council of La Raza, Rafael Magallan

National Scholarship Services and Fund for Negro Students (NSSFNS), John O. Stevenson

National Urban League, James McGhee, Director of Research

Stanford University, Office of the Dean of Graduate School; Edward Escobar, Assistant Dean of the Graduate Division

Student National Medical Association, James Loving, Executive Administrator

United Negro College Fund, Leonard Dawson, Director of Special Projects

United States Department of Education, John R. Jones, Deputy Director, Office of Policy Development/Post Secondary Education Branch; Louis Venuto, Chief of Program Operations, Graduate Programs Branch/Post Secondary Education Branch; Carol J. Smith, Office of Minorities and Women

United States Department of Health and Human Services, Juan Ramos, Director, Division of Special Mental Health Programs/Alcohol, Drug Abuse and Mental Health Administration

University of California, Berkeley, Giuseppe DiPalma, Chairman of Graduate Admissions, Department of Political Science; Beverly Russell, Associate Dean, Graduate School of Public Policy; William K. Muir, Chairman, Department of Political Science

University of Colorado, Boulder, Luther Williams, Vice Chancellor for Academic Affairs

University of Illinois, Champaign, George Yu, Chairman Admissions Committee, Department of Political Science

University of Massachusetts, James Blackwell, Professor of Sociology

University of Michigan, Ann Arbor, Donald Deskins, Associate Dean, Rackham Graduate School

Vanderbilt University, Willis Hawley, Dean, School of Education and Public Policy

Washington Office of the College Board, Darryl Greer

Washington University, St. Louis, Lucius Barker, Chairman, Department of Political Science

Western Washington State University, Sam Kelly, Vice President Academic Affairs and Peter Elich, Chairman, Department of Psychology

APPENDIX C

TECHNICAL ASSISTANCE WORKSHOPS
FOR GRADUATE AND PROFESSIONAL SCHOOLS ON
RECRUITMENT, ADMISSIONS AND FINANCIAL ASSISTANCE OF MINORITIES

Region I
Boston, Massachusetts
May 10-11, 1983

Region II
Princeton, New Jersey
April 21-22, 1983

Region III
Philadelphia, Pennsylvania
April 12-13, 1983

Region IV
Atlanta, Georgia
April 27-28, 1983

Region V
Columbus, Ohio
May 17-18, 1983

Region VI
San Antonio, Texas
May 3-4, 1983

Region VII
St. Louis, Missouri
May 26-27, 1983

Regions VIII and X
Seattle, Washington
June 1-2, 1983

Region IX
Los Angeles, California
June 9-10, 1983

APPENDIX D

EXHIBITS: OCR REGULATIONS AND POLICY INTERPRETATION #1

Exhibit 1

Excerpts from Section 100.3 - Discrimination Prohibited

§ 100.3 Discrimination prohibited.

(a) General. No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program to which this part applies.

(b) Specific discriminatory actions prohibited. (1) A recipient under any program to which this part applies may not, directly or through contractual or other arrangements, on ground of race, color, or national origin:

(i) Deny an individual any service, financial aid, or other benefit provided under the program;

(ii) Provide any service, financial aid, or other benefit to an individual which is different, or is provided in a different manner, from that provided to others under the program;

(iii) Subject an individual to segregation or separate treatment in any matter related to his receipt of any service, financial aid, or other benefit under the program;

(iv) Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program;

(v) Treat an individual differently from others in determining whether he satisfies any admission, enrollment, quota, eligibility, membership or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit provided under the program;

(vi) Deny an individual an opportunity to participate in the program through the provision of services or otherwise or afford him an opportunity to do so which is different from that afforded others under the program (including the opportunity to participate in the program as an employee but only to the extent set forth in paragraph (c) of this section);

(vii) Deny a person the opportunity to participate as a member of a planning or advisory body which is an integral part of the program.

(2) A recipient, in determining the types of services, financial aid, or other benefits, or facilities which will be provided under any such program, or the class of individuals to whom, or the situations in which, such services, financial aid, other benefits, or facilities will be provided under any such program, or the class of individuals to be afforded an opportunity to participate in any such program, may not, directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their

race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respect individuals of a particular race, color, or national origin.

(3) In determining the site or location of a facilities, an applicant or recipient may not make selections with the effect of excluding individuals from, denying them the benefits of, or subjecting them to discrimination under any programs to which this regulation applies, on the ground of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this regulation.

(4) As used in this section, the services, financial aid, or other benefits provided under a program receiving Federal financial assistance shall be deemed to include any service, financial aid, or other benefits provided in or through a facility provided with the aid of Federal financial assistance.

(5) The enumeration of specific forms of prohibited discrimination in this paragraph and paragraph (c) of this section does not limit the generality of the prohibition in paragraph (a) of this section.

(6)(i) In administering a program regarding which the recipient has previously discriminated against persons on the ground of race, color, or national origin, the recipient must take affirmative action to overcome the effects of prior discrimination.

(ii) Even in the absence of such prior discrimination, a recipient in administering a program may take affirmative action to overcome the effects of conditions which resulted in limiting participation by persons of a particular race, color, or national origin.

Exhibit 2

Excerpts from Section 100.6 - Compliance Information and Section 100.7 - Conduct of Investigations

§ 100.6 Compliance Information.

(a) Cooperation and assistance. The responsible Department official shall to the fullest extent practicable seek the cooperation of recipients in obtaining compliance with this part and shall provide assistance and guidance to recipients to help them comply voluntarily with this part.

(b) Compliance reports. Each recipient shall keep such records and submit to the responsible Department official or his designee timely, complete and accurate compliance reports at such times, and in such form and containing such information, as the responsible Department official or his designee may determine to be necessary to enable him to ascertain whether the recipient has complied or is complying with this part. For example, recipients should have available for the Department racial and ethnic data showing the extent to which members of minority groups are beneficiaries of and participants in federally-assisted programs. In the case of any program under which a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.

(c) Access to sources of information. Each recipient shall permit access by the responsible Department official or his designee during normal business hours to such of its books, records accounts, and other sources of information, and its facilities as may be pertinent to ascertain compliance with this part. Where any information required of a recipient is in the exclusive possession of any other agency, institution or person and this agency, institution or person shall fail or refuse to furnish this information the recipient shall so certify in its report and shall set forth what efforts it has made to obtain the information. Asserted considerations of privacy or confidentiality may not operate to bar the Department from evaluation or seeking to endorse compliance with this Part. Information of a confidential nature obtained in connection with compliance evaluation or enforcement shall not be disclosed except where necessary in formal enforcement proceedings or where otherwise required by law.

(d) Information to beneficiaries and participants. Each recipient shall make available to participants, beneficiaries, and other interested persons such information regarding the provisions of this regulation and its applicability to the program for which the recipient receives Federal financial assistance, and make such information available to them in such manner, as the responsible Department official finds necessary to apprise such person of the protections against discrimination assured them by the Act and this regulation. (Sec. 601, 602, Civil Rights Act of 1964; 78 Stat. 252; 42 U.S.C. 2000d, 2000d-1)

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§ 100.7 Conduct of investigations.

(a) Periodic compliance reviews. The responsible Department official or his designee shall from time to time review the practices of recipients to determine whether they are complying with this part.

(b) Complaints. Any person who believes himself or any specific class of individuals to be subjected to discrimination prohibited by this part may by himself or by a representative file with the responsible Department official or his designee a written complaint. A complaint must be filed not later than 180 days from the date of the alleged discrimination unless the time for filing is extended by the responsible Department official or his designee.

(c) Investigations. The responsible Department official or his designee will make a prompt investigation whenever a compliance review, report, complaint, or any other information indicates a possible failure to comply with this part. The investigation should include, where appropriate, a review of the pertinent practices and policies of the recipient, the circumstances under which the possible noncompliance with this part occurred, and other factors relevant to a determination as to whether the recipient has failed to comply with this part.

(d) Resolution of matters. (1) If an investigation pursuant to paragraph (c) of this section indicates a failure to comply with this part the responsible Department official or his designee will so inform the recipient and the matter will be resolved by informal means whenever possible. If it has been determined that the matter cannot be resolved by informal means, action will be taken as provided for in Section 100.8.

(2) If an investigation does not warrant action pursuant to subparagraph (1) of this paragraph the responsible Department official or his designee will so inform the recipient and the complainant, if any, in writing.

(e) Intimidatory or retaliatory acts prohibited. No recipient or other person shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by section 601 of the Act or this part, or because he has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding or hearing under this part. The identity of complainants shall be kept confidential except to the extent necessary to carry out the purposes of this part, including the conduct of any investigation, hearing, or judicial preceeding arising thereunder.

(See 601, 602, Civil Rights Act of 1964; 78 Stat. 252; 42 U.S.C. 2000d, 2000d-1)

Exhibit 3

Federal Financial Assistance to Which These Regulations Apply*

Appendix A

Federal Financial Assistance to Which These Regulations Apply

Part 1. Assistance other than for State-Administered Continuing Programs

1. Loans for acquisition of equipment for academic subjects, and for minor remodeling (20 U.S.C. 445).
2. Construction of facilities for institutions of higher education (20 U.S.C. 701-758).
3. School Construction in federally-affected and in major disaster areas (20 U.S.C. 631-647).
4. Construction of educational broadcast facilities (47 U.S.C. 390-399).
5. Loan service of captioned films and educational media; research on, and production and distribution of, educational media for the handicapped, and training of persons in the use of such media for the handicapped (20 U.S.C. 1452).
6. Demonstration residential vocational education schools (20 U.S.C. 1321).
7. Research and related activities in education of handicapped children (20 U.S.C. 1441).
8. Educational research, dissemination and demonstration projects; research training; and construction under the Cooperation Research Act (20 U.S.C. 331-332(b)).
9. Research in teaching modern foreign languages (20 U.S.C. 512).
10. Training projects for manpower development and training (42 U.S.C. 2601, 2602, 2610a-2610c).
11. Research and training projects in Vocational Education (20 U.S.C. 1281(a), 1282-1284).
12. Allowances to institutions training NDEA graduate fellows (20 U.S.C. 461-465).
13. Grants for training personnel for the education of handicapped children (20 U.S.C. 1431).
15. Allowances for institutions training teachers and related educational personnel in elementary and secondary education, or post-secondary vocational education (20 U.S.C. 1111-1118).
16. Recruitment, enrollment, training and assignment of Teacher Corps personnel (20 U.S.C. 1101-1107a).
17. Operation and maintenance of schools in Federally-affected and in major disaster areas (20 U.S.C. 236-241; 241-1; 242-244).
18. Grants or contracts for the operation of training institutes for elementary or secondary school personnel to deal with

* This is not a complete and current listing. A complete and current listing is not available.

special educational problems occasioned by desegregation (42 U.S.C. 2000c-3).

19. Grants for in-service training of teachers and other schools personnel and employment of specialists in desegregation problems (12 U.S.C. 2000c-4).

20. Higher education students loan program (Title II, National Defense Education Act, 20 U.S.C. 421-429).

21. Educational Opportunity grants and assistance for State and private programs of low-interest insured loans and State loans to students in institutions of higher education (Title IV, Higher Education Act of 1965, 20 U.S.C. 1061-1087).

22. Grants and contracts for the conduct of Talent Search, Upward Bound, and Special Services Programs (20 U.S.C. 1068).

23. Land-grant college aid (7 U.S.C. 301-308; 321-326; 328-331).

24. Language and area centers (Title VI, National Defense Education Act. 20 U.S.C. 511).

25. American Printing House for the Blind (20 U.S.C. 101-105).

26. Future Farmers of America (36 U.S.C. 271-391) and similar programs.

27. Science clubs (P.L. 85-875, 20 U.S.C. 2, note).

28. Howard University (20 U.S.C. 121-129).

29. Gallaudet College (31 D.C. Code, Ch. 10).

30. Establishment and operation of a model secondary school for the deaf by Gallaudet College (31 D.C. Code 1051-1053; 80 Stat. 1027-1028).

31. Faculty development programs, workshops and institutes (20 U.S.C. 1131-1132).

32. National Technical Institute for the Deaf (20 U.S.C. 681-685).

33. Institutes and other programs for training educational personnel (Parts D, E, & F, Title V, Higher Education Act of 1965) (20 U.S.C. 1119-1119c-4).

34. Grants and contracts for research and demonstration projects in librarianship (20 U.S.C. 1034).

35. Acquisition of college library resources (20 U.S.C. 1021-1028).

36. Grants for strengthening developing institutions of higher education (20 U.S.C. 1051-1054); National Fellowships for teaching at developing institutions (20 U.S.C. 1055), and grants to retired professors to teach at developing institutions (20 U.S.C. 1056).

37. College Work Study Program (42 U.S.C. 2751-2757).

38. Financial assistance for acquisition of higher education equipment, and minor remodeling (20 U.S.C. 1121-1129).

39. Grants for special experimental demonstration projects and teacher training in adult education (20 U.S.C. 1208).

40. Grant programs for advanced and undergraduate international studies (20 U.S.C. 1171-1176; 22 U.S.C. 2452(b)).

41. Experimental projects for developing State leadership or establishment of special services (20 U.S.C. 865).

42. Grants to and arrangements with State educational and other agencies to meet special educational needs of migratory children of migratory agricultural workers (20 U.S.C. 241e (c)).

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43. Grants by the Secretary to local educational agencies for supplementary educational centers and services; guidance, counseling and testing (20 U.S.C. 841-844; 844b).
44. Resource centers for improvement of education of handicapped children (20 U.S.C. 1421) and centers and services for deaf-blind children (20 U.S.C. 1422).
45. Recruitment of personnel and dissemination of information on education of handicapped (20 U.S.C. 1433).
46. Grants for research and demonstrations relating to physical education or recreation for handicapped children (20 U.S.C. 1442) and training of physical educators and recreation personnel (20 U.S.C. 1434).
47. Dropout prevention projects (20 U.S.C. 887).
48. Bilingual education programs (20 U.S.C. 880b-880b-6).
49. Grants to agencies and organizations for Cuban refugees (22 U.S.C. 2601(b)(4)).
50. Grants and contracts for special learning disabilities including research and related activities training and operating model centers (20 U.S.C. 1461).
51. Curriculum development in vocational and technical education (20 U.S.C. 1391).
52. Establishment, including construction and operation of a National Center on Educational Media and Materials for the Handicapped (20 U.S.C. 1453).
53. Grants and contracts for the development and operation of experimental preschool and early education programs for handicapped (20 U.S.C. 1423).
54. Grants to public or private non-profit agencies to carry on the Follow Through Program in kindergarten and elementary schools (42 U.S.C. 2809(a)(2)).
55. Grants for programs of cooperative education and grants and contracts for training and research in cooperative education (20 U.S.C. 1087a-1087c).
56. Grants and contracts to encourage the sharing of college facilities and resources (network for knowledge) (20 U.S.C. 1133-1133b).
57. Grants, contracts, and fellowships to improve programs preparing persons for public service and to attract students to public service (20 U.S.C. 1134-1134b).
58. Grants for the improvement of graduate programs (20 U.S.C. 1135-1135c).
59. Contracts for expanding and improving law school clinical experience programs (20 U.S.C. 1136-1136b).
60. Exemplary programs and projects in vocational education (20 U.S.C. 1301-1305).
61. Grants to reduce borrowing cost for construction of residential schools and dormitories (20 U.S.C. 1323).
62. Surplus real and related personal property disposal for educational purposes (40 U.S.C. 484(k)).

Part 2 - Continuing Assistance to State Administered Programs.

1. Grants to States for public library service and construction, interlibrary cooperation and specialized State library services for certain State institutions and the

physically handicapped (20 U.S.C. 351-355).

2. Grants to States for strengthening instruction in academic subjects (20 U.S.C. 441-444).

3. Grants to States for vocational education (20 U.S.C. 1241-1264).

4. Arrangements with State education agencies for training under the Manpower Development and Training Act (42 U.S.C. 2601-2602, 2610a).

5. Grants to States to assist in the elementary and secondary education of children of low-income families (20 U.S.C. 241a-242m).

6. Grants to States to provide for school library resources, textbooks and other instructional materials for pupils and teachers in elementary and secondary schools (20 U.S.C. 821-827).

7. Grants to States to strengthen State departments of education (20 U.S.C. 861-870).

8. Grants to States for community service programs (20 U.S.C. 1001-1011).

9. Grants to States for adult basic education and related research, teacher training and special projects (20 U.S.C. 1201-1211).

10. Grants to States educational agencies for supplementary educational centers and services, and guidance, counseling and testing (20 U.S.C. 841-847).

11. Grants to States for research and training in vocational education (20 U.S.C. 1281(b)).

12. Grants to States for exemplary programs and projects in vocational education (20 U.S.C. 1301-1305).

13. Grants to States for residential vocational education schools (20 U.S.C. 1321).

14. Grants to States for consumer and homemaking education (20 U.S.C. 1341).

15. Grants to States for cooperative vocational educational program (20 U.S.C. 1351-1355).

16. Grants to States for vocational work study programs (20 U.S.C. 1371-1374).

17. Grants to States to attract and qualify teachers to meet critical teaching shortages (20 U.S.C. 1108-1110c).

18. Grants to States for education of handicapped children (20 U.S.C. 1411-1414).

19. Grants for administration of State plans and for comprehensive planning to determine construction needs of institutions of higher education (20 U.S.C. 715(b)).

Exhibit 4

Title VI of the Civil Rights Act of 1964
Policy Interpretation Number 1

SUBJECT: Voluntary Affirmative Action: Admission of Minority Students to Institutions of Higher Education.

PURPOSE: This policy interpretation encourages institutions of higher education to continue and expand voluntary affirmative action programs to increase their enrollment of minority group members and to attain a diverse student body. It identifies permissible techniques to achieve these objectives consistent with Title VI of the Civil Rights Act of 1964 and the Supreme Court's decision in Regents of the University of California v. Bakke, 438 U.S. 265 (1978) (Bakke).

SUMMARY OF POLICY INTERPRETATION: An institution of higher education that receives Federal financial assistance is encouraged to take voluntary affirmative action in admissions to overcome the effects of conditions that have resulted in limited participation by minority group members and to attain a diverse student body. The Department has reviewed the Supreme Court's decision in Bakke and has determined that voluntary affirmative action may include, but is not limited, to following: consideration of race, color, or national origin among the factors evaluated in selecting students; increased recruitment in minority institutions and communities; use of alternative admissions criteria when traditional criteria are found to be inadequately predictive of minority student success; provision of preadmission compensatory and tutorial programs; and the establishment and pursuit of numerical goals to achieve the racial and ethnic composition of the student body the institution seeks.

Techniques of this kind are permissible regardless of whether there has been a finding of past discrimination. Where such a finding has been made, an institution has a duty to overcome the effects of past discrimination and, therefore, may be required to employ these as well as other race conscious techniques to overcome the effects of discrimination found to have been committed by related institutions. However, in light of Bakke, in the absence of finding of past discrimination committed by the institution or related entities, a fixed number of positions may not be set aside for minority students for which nonminority students cannot compete, nor may race or national origin otherwise be used as the sole criterion for admissions.

POLICY INTERPRETATION: Title VI of the Civil Rights Act of 1964 prohibits institutions of higher education that receive or benefit from Federal financial assistance from discriminating against applicants for admission on the basis of race, color, or national origin. The primary purpose of the statute

was to eliminate widespread discrimination against blacks and other minorities in federally-assisted programs. Accordingly, the Department's Title VI regulation requires recipients of Federal financial assistance, when found to be discriminating, to end any current discrimination and to take affirmative action to overcome the effects of past discrimination.

Findings of discrimination can be made by a legislative, judicial or administrative body, including the Office for Civil Rights. The regulation also permits a recipient to take affirmative action to overcome the effects of conditions that have resulted in limited participation by persons of a particular race, color, or national origin and to attain a diverse student body. This is permitted even though the recipient has not itself discriminated against these groups.

The Department has reviewed its Title VI regulation, in light of the Supreme Court's decision in Bakke, and has concluded that no changes in the regulation are required or desirable. The Court affirmed the legality of voluntary affirmative action. However, where there has been no finding of past discrimination, Bakke prohibits an institution from setting aside a fixed number of places for minority students for which nonminorities cannot compete, or otherwise using race as the sole criterion for admission.

The limitations contained in Bakke apply only to institutions undertaking voluntary affirmative action. The decision has no bearing on the legal obligation of an institution which has been found, by a court, legislature or administrative agency, to have discriminated on the basis of race, color, or national origin. Race conscious procedures that are impermissible in voluntary affirmative action programs may be required to correct specific acts of past discrimination committed by an institution or other entity to which the institution is directly related. For example, newly established public institutions of higher education in a State that formerly maintained segregated colleges may be required to participate in a desegregation plan to provide a complete remedy for past discrimination.

The Department encourages the continuation and expansion of voluntary affirmative action programs. This policy interpretation provides guidance to institutions of higher education that are not responding to a finding of past discrimination as to permissible means of increasing minority student enrollments under the Department's Title VI regulation. One illustration of permissible voluntary action is stated in the regulation:

> Even though an applicant or recipient has never used discriminatory policies, the services and benefits of the program or activity it administers may not in fact be equally available to some racial or nationality

groups. In such circumstances, an applicant or recipient may properly give special consideration to race, color, or national origin to make the benefits of its program more widely available to such groups, not being adequately served. For example, where a university is not adequately serving members of a particular racial or nationality group, it may establish special recruitment policies to make its program better known and more readily available to such group, and take other steps to provide that group with more adequate service.

Other methods of considering race, color, or national origin in voluntary affirmative action programs, consistent with Bakke and the Department's regulation, include but are not limited to the following:

An institution may:

1. Consider race, color, or national origin as a positive factor, with other factors, such as geographic or economic circumstance, in selecting from among qualified candidates. The relative weight granted to each factor is properly determined by institution officials; race, color or national origin may be accorded greater weight than other factors;

2. Recruit, or increase recruiting, in predominantly minority institutions and communities;

3. Modify admissions criteria for minorities if it determines that it is necessary for a fair appraisal of the academic promise of minority applicants. This may be appropriate to cure established inaccuracies in predicting performance where an institution can demonstrate that traditional admissions criteria are not predictive of success for minority students;

4. Offer special services, including summer institutes and special tutoring services, to assist educationally and socially disadvantaged students in meeting admissions requirements. Students may not be excluded from these programs on the basis of race, but race may be considered as a factor in selecting participants; and

5. Establish and pursue numerical goals to achieve the racial and ethnic composition of the student body it seeks through techniques such as those listed above.

In addition to the foregoing techniques, institutions may use their authority to broaden admissions criteria generally to evaluate better the qualifications of minority applicants. This may be accomplished by giving increased consideration to an applicant's character, motivation, ability to overcome

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economic and educational disadvantage, work experience, and other factors.

All of these techniques are consistent with Title VI because they do not exclude individuals on the basis of race, color, or national origin from competing for any place in an institution of higher education. The Department encourages the development of additional or alternative techniques for inclusion in voluntary affirmative action plans.

AUTHORITY: Regulation issued under Title VI of the Civil Rights Act of 1964, 45 C.F.R.:

Section 80.3(b)(6)

(i) In administering a program regarding which the recipient has previously discriminated against persons on the ground of race, color, or national origin, the recipient must take affirmative action to overcome the effects of prior discrimination.

(ii) Even in the absence of such prior discrimination, a recipient in administering a program may take affirmative action to overcome the effects of conditions which resulted in limiting participation by persons of a particular race, color, or national origin.

Section 80.5(j)

Even though an applicant or recipient has never used discriminatory policies, the services and benefits of the program or activity it administers may not, in fact, be equally available to some racial or nationality groups. In such circumstances, an applicant or recipient may properly give special consideration to race, color or national origin to make the benefits of its program more widely available to such groups, not then being adequately served. For example, where a university is not adequately serving members of a particular racial or nationality group, it may establish special recruitment policies to make its programs better known and more readily available to such group, and take other steps to provide that group with more adequate service.

COVERAGE: This policy interpretation applies to any public or private institution of higher education that receives or benefits from financial assistance authorized or extended under a law administered by the Department. Coverage includes institutions whose students participate in HEW funded or guaranteed student loan assistance programs. For further information, see definition of recipient at 45 C.F.R. 80.13 (i) and (j).

APPENDIX E

OFFICE FOR CIVIL RIGHTS REGIONAL OFFICES

Region I

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region I
John W. McCormack Post Office
and Court House, Room 222
Post Office Square
Boston, MA 02110
(617) 223-1154
TTY 223-1111

Region II

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region II
26 Federal Plaza, Rm. 33-100
New York, NY 10278
(212) 264-5180
TTY 264-9464

Region III

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region III
3535 Market St., Gateway Bldg.
P.O. Box 13716
Philadelphia, PA 19101
(215) 596-6787
TTY 596-6794

Region IV

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region IV
101 Marietta Tower, Rm. 2725
Atlanta, GA 30323
(404) 221-2985
TTY 221-3322

Region V

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region V
300 South Wacker Dr, 8th Fl.
Chicago, IL 60606
(312) 886-3456
TTY 353-2540

Region VI

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region VI
1200 Main Tower, Room 1430
Dallas, TX 75202
(214) 767-3856
TTY 767-6599

Region VII

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region VII
324 East 11th Street, 24th Fl.
Kansas City, MO 64106
(816) 374-2223
TTY 374-7264

Region VIII

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region VIII
Federal Office Building
1961 Stout Street, 3rd Floor
Denver, CO 80294
(303) 844-5695
TTY 837-3417

Region IX

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region IX
1275 Market St., 14th Fl.
San Francisco, CA 94103
(415) 556-9894
TTY 556-1933

Region X

Regional Civil Rights
Director
U.S. Department of Education
Office for Civil Rights,
Region X
2901 3rd Ave., Mail Stop 106
Seattle, WA 98121
(206) 442-1636
TTY 442-4542

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